



Status Of The State Small Business Stationary Source Technical And Environmental Compliance Assistance Program (SBTCP)

**Report To Congress
For The Period
January To December 1996**

REPORT TO CONGRESS

**STATUS OF THE STATE SMALL BUSINESS
STATIONARY SOURCE TECHNICAL AND ENVIRONMENTAL
COMPLIANCE ASSISTANCE PROGRAM (SBTCP)**

**FOR THE REPORTING PERIOD
JANUARY - DECEMBER 1996**

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LIST OF COMMON ACRONYMS

Provided below is a list of the major abbreviations and acronyms which are commonly used in this report.

CAA	Clean Air Act as amended in 1990
CAP	Compliance Advisory Panel
COI	Conflict of Interest
EPA	Environmental Protection Agency
FTE	Full-time Equivalent
ICR	Information Collection Request
OECA	Office of Enforcement and Compliance Assurance
OMB	Office of Management and Budget
SBAP	Small Business Assistance Program
SBO	Small Business Ombudsman
SBTCP	Small Business Stationary Source Technical and Environmental Compliance Assistance Program
SIC	Standard Industrial Classification
SIP	State Implementation Plan

EXECUTIVE SUMMARY

The U.S. Environmental Protection Agency's (EPA's) Small Business Ombudsman (SBO) is pleased to submit this second Annual Report to Congress describing the activities and accomplishments of the state Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCPs) during the reporting period, January 1 - December 31, 1996.

This report is being submitted in accordance with Section 507(d), *Monitoring*, of the Clean Air Act, as amended in 1990 (CAA), which directs EPA to provide Congress with periodic reports on the status of the SBTCPs. This oversight responsibility has been delegated by the EPA Administrator to EPA's Small Business Ombudsman (SBO). The Report also includes a general report on the SBO's actions to monitor the SBTCPs.

This report addresses two of the EPA SBO's key oversight responsibilities:

- Render advisory opinions on the overall effectiveness of the SBTCPs, difficulties encountered, and degree and severity of enforcement [507(d)(1)].
- Make periodic reports to Congress on compliance of the SBTCPs with the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act [507(d)(2)].

The SBTCPs are designed to assist small businesses in complying with the requirements of the CAA through state-operated programs. Each SBTCP is required to include three components: an SBO, a Small Business Assistance Program (SBAP), and a Compliance Advisory Panel (CAP).

During the second year of monitoring the SBTCPs, over 73,000 small businesses have been directly reached, and over 3,800 on-site consultations have been conducted (as tallied by industry sector assists). SBTCP staff members continue to fill an important role as facilitator or mediator between small business owners/operators and regulatory agencies, enhancing communication to promote understanding and sensitivity on both sides. Based on the information reported, improvements in compliance occur because businesses have someone to turn to for assistance and advice, and to act as an effective liaison with regulatory agencies.

SBTCP yearly operational growth has been continuous since 1990. As of the end of 1996, 50 SBOs (94 percent), 52 SBAPs (98 percent), and 36 CAPs (68 percent) are operational. The SBTCPs are staffed with two or fewer full time equivalents (FTEs) in 77 percent of the SBO functions and 4 or fewer FTEs in 70 percent of the SBAP functions. These figures are the same as last year. 58 percent of programs (up from 49 percent last year) report that at least the required 7 members have been appointed to their CAPs.

Budgets for the SBTCPs have a wide range from \$0 to over \$2,000,000 for 1996. 98 percent of SBOs (36 of 37) with their own budgets operate their programs with less than \$200,000. For all 53 programs, 19 percent of SBOs operate with budgets of between \$0 and \$25,000; 11 percent operate with budgets of between \$25,001 and \$50,000; 13 percent operate with budgets of between \$50,001 and \$75,000; and 11 percent operate with budgets of between \$75,001 and \$100,000.

Similarly, of the 37 SBAPs with their own budgets, 86 percent are allotted less than \$400,000. For all 53 programs, 4 percent operate with budgets of between \$0 and \$25,000; 4 percent operate with budgets of between \$25,001 and \$50,000; 11 percent operate with budgets of between \$50,001 and \$75,000; and 11 percent operate with budgets of between \$75,001 and \$100,000. As programs mature and the cost of establishing programs stabilize, more programs are projecting fairly consistent budgets for the next reporting period (35 this year versus 25 last year). The number of programs projecting budget increases has declined from 15 last year to 11 this year.

89 percent of SBTCPs provided specific information on the types of industry sectors and number of facilities that their programs assisted. 121 industry sectors received assistance in 1996. The top ten industry sectors receiving assistance (general and on-site) by SBTCPs in 1996 were:

- Other (not classified)
- Auto Body Maintenance/Refinishing/Repair
- Dry Cleaners/Laundry Services
- Wood Products/Furniture/Finishing
- Printing/Graphic Arts
- Metal Fabrication/Finishing/Forging/Casting
- Attorney/Consultant/Engineer
- Manufacturing

- Gasoline Distribution (Wholesale/Retail)
- Boilers.

On-site visits were characterized as being highly effective in providing the individualized attention often required to assist a facility in achieving compliance. The top ten industry sectors that received on-site assistance were:

- Auto Body Maintenance/Refinishing/Repair
- Dry Cleaning/Laundry Services
- Other (not classified)
- Wood Products/Furniture/Refinishing
- Printing/Graphic Arts
- Metal Fabrication/Finishing/Forging/Casting
- Construction/Contractors
- Gasoline Distribution (Wholesale/Retail)
- Manufacturing
- Plastic Manufacturing/Products.

The top ten industry sectors that received assistance from the most programs were:

- Dry Cleaning/Laundry Services (37 programs)
- Auto Body Maintenance/Refinishing/Repair (36 programs)
- Printing/Graphic Arts (32 programs)
- Metal Fabrication/Finishing/Forging/Casting (27 programs)
- Wood Products/Furniture/Finishing (25 programs)
- Attorney/Consultant/Engineer (17 programs)
- Gasoline Distribution (Wholesale/Retail) (16 programs)
- Other (not classified) (16 programs)
- Chrome Plating (15 programs)
- Construction/Contractors (14 programs).

Toll-free hotlines, fact sheets, brochures, seminars, and meetings are among the wide range of outreach mechanisms used to serve the small business community. Other state-of-the-art outreach activities, such as Internet home pages, are seeing increased use. The number of programs with web pages has more than doubled from 13 in 1995 to 28 in 1996.

87 percent of SBOs (up from 66 percent in 1995), 87 percent of SBAPs (up from 81 percent in 1995), and 38 percent of CAPs (down from 40 percent in 1995) report some sharing of resources within their state/territory. Generally, programs recognize

the efficiency and value of coordinating their efforts with each other and also with environmental agency departments, state agencies, and other organizations.

92 percent of programs (as compared to 83 percent last year) report actions have been taken to minimize duplication of efforts among SBTCPs. Sharing information is a practical approach to maximizing program efficiency while enhancing the cost-effectiveness of funding spent on individual programs.

Section 507 directs EPA's SBO to monitor the SBTCPs' efforts to follow the intent of the provisions of the Paperwork Reduction, Regulatory Flexibility, and Equal Access to Justice Acts.

- 58 percent of programs (as compared to 42 percent last year) report taking specific actions associated with paperwork reduction, with the most common action being CAP review of SBTCP documents.
- 51 percent of programs (up from 42 percent) report taking specific actions consistent with the intent of the Regulatory Flexibility Act. The primary activity by programs was the review and comment on new air regulations to evaluate their impact on small businesses.
- 34 percent of SBTCPs (as compared to 30 percent last year) reported specific actions similar to those associated with the Equal Access to Justice Act. These include the establishment of pro bono legal services, the availability of funding for technical assistance services for citizen groups aggrieved by permit actions of a regulatory agency, and the review of SBTCP documents for compliance.

The number of programs reporting specific actions to follow the intent of the provisions of these Acts grew in 1996. The steps being taken appear to be better targeted to the specific intent of each Act and in addressing the unique needs of small businesses.

70 percent of SBTCPs report that small businesses provided comments on the assistance programs and that feedback was overwhelmingly positive. Common themes were similar to those in 1995. Small businesses appreciated the availability of a non-regulatory approach for certain problems and the personalized guidance through the many regulatory processes leading to compliance.

51 percent of programs provided examples of complaints received and resolution strategies employed. Resolution of issues between the small business and regulatory communities comprises a significant portion of the SBTCPs' activities, which included:

- Developing plain language explanations of regulatory requirements.**
- Providing one-on-one guidance through the paperwork process.**
- Facilitating communication about regulatory flexibility and compliance assistance issues between small business and regulatory agencies.**

96 percent of the SBTCPs (up from 85 percent in 1995) provided insight on the types of compliance issues addressed during the course of providing technical assistance to small businesses. Two of the three most common compliance problems mentioned by small businesses were, "Not understanding the regulatory requirements," and "Operating without a permit," the same issues most commonly addressed last year. Programs reported, "More open communication between sources and agencies," and "Increased compliance," as a result of program outreach efforts.

Generally, small businesses want to comply with environmental regulations; however, they may be afraid to ask for help. When a non-threatening assistance program, such as the SBTCP, is available, small businesses are eager to take advantage of the services, as this help increases chances of survival and profitability.

45 SBTCPs provided recommendations for changes to facilitate small business compliance with the CAA. Once again, the most frequent recommendation was flexibility in applying regulations to small businesses (42 percent of programs).

In addition to inquiries regarding air issues, many programs are being contacted about multimedia problems as well. 26 percent of programs suggested expanding assistance to cover multimedia programs (i.e., air, water, solid waste).

Programs were asked to describe how their SBTCP avoids internal or external conflicts of interest or the perception that their program may not be confidential. 77 percent of programs reported no problems concerning confidentiality or with conflict of interest issues during the course of providing services; 9 programs indicated that no confidentiality program or guarantee of confidentiality is in place. Program

structures range from a guarantee of confidentiality (most common) to offering no confidentiality. Many programs have policies that protect small businesses from penalties if violations are discovered during the course of their receiving technical assistance.

The SBTCPs offer important one-on-one contacts, provide valuable information such as the need to have operating permits, maintaining records, compliance options, pollution prevention technologies and techniques, and compliance requirements. This assistance enables small businesses to arrive at informed decisions and more effectively come into compliance.

CONCLUSIONS AND RECOMMENDATIONS

- As was noted in the 1995 report, SBTCPs are being run by hardworking, dedicated staffs who operate successful programs with often limited budgets and resources. Small businesses are grateful for the technical assistance and personalized attention from people they can trust. In this second year of gathering information from the programs, over 73,000 small businesses have been reached, and over 3,800 on-site consultations have been performed (as tallied by industry sector).
- SBTCPs facilitate dialog between the small business community and the regulatory community, fostering trust and improved attitudes towards regulatory compliance.
- Programs have significant expertise and are increasingly becoming multimedia as states want to offer this type of assistance, and small businesses are requesting it. Programs are seeking ways to expand the scope and quality of the services they offer.
- Commonly identified compliance problems include not understanding regulatory requirements and operating without a permit, the same as in 1995. SBTCPs suggested reasons for these problems may be the overwhelming volume of regulations, businesses' fear of talking to regulators, and the amount of paperwork required to come into compliance. Many current SBTCP activities have remedied such problems. The concerns regarding these problems underscore the critical role of the SBTCP in providing vital technical assistance and promoting compliance by establishing trust and greater understanding.
- Programs are to be commended for their accomplishments in continuing to promote compliance. Highlights include more open communication between sources and agencies and greater understanding/awareness of regulations by small businesses. Award programs and loan programs have proved to be effective in providing incentives, both for small businesses and the programs themselves. Programs should consider developing award and loan programs as incentives for their small business customers.

- In conducting the Federal program, EPA has followed the requirements of the Paperwork Reduction, Regulatory Flexibility, and Equal Access to Justice Acts. EPA's SBO has monitored SBTCP's activities for following the intent of the provisions of these Acts. The careful review of SBTCP documents and the development of simplified forms and permits are among the positive actions implemented to fulfill the intent of the Acts.
- Program activities primarily emphasize mechanisms to reach larger audiences (e.g., mailings, hotlines). However, one-on-one assistance has been reported as the most effective method in bringing small businesses into compliance, and programs are encouraged to increase their emphasis on personalized assistance. It is important that adequate resources are allocated to permit on-site visits by their staff. On-site visits (as tallied by industry sector) almost doubled from over 2,000 last year to over 3,800 this year.
- With the strong small business technical assistance infrastructure in place through the SBTCPs, programs should explore their potential to expand into multimedia assistance. A number of programs already offer multimedia assistance and industry-specific permitting, which can ease the regulatory burden on small businesses and promote compliance.
- Efficiency of information transfer (among SBTCPs and to small businesses) can be realized through the increased use of Internet home pages (and to a lesser extent electronic bulletin boards, which have become less common). Presently, 53 percent of programs operate some type of electronic information transfer, up from 25 percent last year; 6 additional programs indicated plans to implement home pages in 1997. Such electronic services also would be promising mechanisms to avoid duplication of effort among programs. Programs again are encouraged to explore the potential of the Internet or bulletin board services for sharing information with small businesses and with other SBTCPs.
- Programs are encouraged to explore the potential for sponsoring or facilitating financial assistance programs for pollution control or pollution prevention capital expenses. (Only 11 percent of SBTCPs reported the availability of financial assistance programs in 1996, down from 19 percent last year.) Small businesses have expressed their need for creative financing mechanisms, which was recommended by 25 percent of SBTCPs as a method for enhancing compliance.
- SBTCPs are often underfunded and understaffed as they provide their current level of services. Because of this, they are likely to be challenged to expand their function both in air-related outreach and multimedia technical assistance. SBTCPs are encouraged to better utilize the expertise of their CAP members to enhance improvements in their technical assistance programs. Several states still do not have operational CAPs. A number of CAPs also need to address vacancies of the CAP due to expired terms.

1.0 INTRODUCTION AND REPORT OVERVIEW

1.1 RATIONALE AND OBJECTIVE OF THE REPORT TO CONGRESS

The U.S. Environmental Protection Agency's (EPA's) Small Business Ombudsman is pleased to submit this Report to Congress describing the accomplishments and activities of the state/territory Small Business Stationary Source Technical and Environmental Compliance Assistance Programs (SBTCP) during the January 1, - December 31, 1996 reporting period.

This report represents the second Annual Report to Congress on this important program designed to help the small business community understand and cost-effectively comply with the requirements of the Clean Air Act Amendments (CAA) as amended in 1990.

This report is being submitted in accordance with Section 507(d), *Monitoring*, of the CAA, which directs the EPA to provide Congress with an Annual Report on the SBTCP. This oversight and reporting responsibility has been delegated by the EPA Administrator to the EPA Small Business Ombudsman (SBO).

This report is intended to address two of the EPA SBO's responsibilities with respect to the SBTCP.

1. Render advisory opinions on the overall effectiveness of the SBTCPs, difficulties encountered, and severity of enforcement [507(d)(1)].
2. Make periodic reports to Congress on compliance of the SBTCPs with the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act [507(d)(2)].

1.2 DATA COLLECTION METHODOLOGY

Information to assess the SBTCPs was collected through a relatively simple, standardized Annual Reporting Form, which is designed to streamline the reporting process.

During the fall of 1994, EPA's SBO, with assistance from SBTCP personnel, developed the criteria for a standardized Reporting Form. A draft Form was distributed to the state programs for review in November 1994, and the Form was further refined during the National SBO/SBAP Conference in January 1995. Programs also were asked to comment on EPA's Office of Enforcement and Compliance Assurance's (OECA's) sample questions regarding compliance assessment.

In March 1995, EPA's SBO submitted a "Request for Information Collection Request (ICR) Approval" to the Office of Management and Budget (OMB) for the Annual Reporting Form. The Form subsequently was approved and was assigned OMB Number 2060-0337, expiration date 7/31/98.

In December 1996, EPA's SBO distributed copies of the SBTCP Annual Reporting Form (for the reporting period January through December 1995) to state/territory SBTCP contacts (primarily SBOs). These contacts were requested to coordinate completion of this Form among their SBO, SBAP, and CAP. The Annual Reporting Form was provided in hard copy and on computer disk for ease of completion and to reduce the reporting burden. A copy of the 1996 SBTCP Reporting Form is enclosed as Appendix A.

Programs were not asked to create information that they did not have; therefore, some SBTCPs were not able to answer all questions posed. Based on the information requested in the Reporting Form from the first year of reporting, programs were encouraged to revise the types of statistics they track for subsequent years for simplicity in completing future reports.

Programs were asked to provide the information requested in the Annual Reporting Form and submit the Form to the EPA's SBO by February 15, 1997. The information provided in the Forms was compiled and analyzed to produce this report. The 50 states, plus the District of Columbia, Puerto Rico, and the U.S. Virgin Islands, submitted SBTCP Annual Reports (53 programs total) to EPA's SBO.

In addition, Arizona, California, and Kentucky have distinct air quality districts or counties with regulatory jurisdiction within their states, which also submitted full or partial reports. In Arizona, Maricopa County, and Pima County submitted separate

reports. For California, the South Coast Air Quality Management District submitted a full report; partial reports or informational letters were submitted by Bay Area Air Quality Management District, Kern County Air Pollution Control District, Placer County Air Pollution Control District, San Joaquin Valley Unified Air Pollution Control District, San Luis Obispo County Air Pollution Control District, and Santa Barbara County Air Pollution Control District. For Kentucky, Jefferson County submitted a report. For statistical purposes of this report, data from states that submitted multiple reports have been combined except where noted. Raw data for the separate air quality districts are shown in the appendices. Percentages have been rounded.

According to the *Federal Register* of November 13, 1996, Volume 61, Number 220, Pages 58284-94, EPA promulgated a direct final rule conditionally exempting the Territory of American Samoa, the Commonwealth of the Northern Mariana Islands (CNMI), and the Territory of Guam from the requirements of Title V of the CAA. Therefore, reports were not received from American Samoa, CNMI, and Guam.

1.3 ORGANIZATION OF THE REPORT

As detailed below, this report is organized into six main sections, the Executive Summary, and Appendices.

- | | |
|--------------------|---|
| Section 1.0 | Introduction and Report Overview |
| Section 2.0 | Overview of the SBTCP -- This section provides an overview of the three components of the SBTCP (i.e., the SBO, the SBAP, and the CAP) as well as EPA's responsibilities under Section 507. |
| Section 3.0 | SBTCP Status, Budgets, Staffing, and Organization -- This section encompasses these four categories of information about the SBTCPs. |
| Section 4.0 | SBTCP Activities and Services -- In this section, types and levels of services provided by the three components of the states' SBTCPs are discussed including efforts to comply with the Paperwork Reduction, Regulatory Flexibility, and Equal Access to Justice Acts. Financial assistance program information also is included. |

Section 5.0 **Program Effectiveness** -- A discussion of program effectiveness based on comments received by the SBO or CAP, as well as resolution strategies for any negative comments are provided. General information on some of the accomplishments and highlights of the programs in 1996 also are outlined.

Section 6.0 **Compliance Assurance** -- Information on the effectiveness of the three components of the SBTCPs in providing compliance assistance support to state small businesses is provided in this section.

Additional details on the information provided by the individual SBTCPs are included in the various appendices to this report.

2.0 OVERVIEW OF THE SBTCP

As part of Section 507 of the CAA, the U.S. Congress mandated that each state/territory establish a SBTCP to assist small businesses comply with the requirements of this Act through state-operated programs. Each SBTCP (also commonly referred to as a "Section 507 program") is required to include the following three components:

- Small Business Ombudsman (SBO)
- Small Business Assistance Program (SBAP)
- Compliance Advisory Panel (CAP).

The CAA also required states/territories to develop a State Implementation Plan (SIP) for implementing an SBTCP by November 1992. As of December 31, 1996, 50 of 53 states/territories (94 percent) had received approval from EPA for their SIPs implementing Section 507 of the CAA. States/territories whose SIPs have not yet been submitted/approved are:

- Hawaii -- not yet submitted
- Rhode Island -- submitted, but not yet approved
- Vermont -- submitted draft.

2.1 SMALL BUSINESS OMBUDSMAN

The state/territory SBOs serve as the small business community's representative where small businesses are impacted by the CAA. The SBO's key responsibilities may include:

- Review and provide recommendations to EPA and state/local air pollution control authorities regarding development and implementation of regulations impacting small businesses.
- Assist in dissemination of information about upcoming air regulations, control requirements, and other matters relevant to small businesses.
- Refer small businesses to appropriate specialists for help with specific needs.
- Conduct studies to evaluate the effects of the CAA on state and local economies, and on small businesses generally.

2.2 SMALL BUSINESS ASSISTANCE PROGRAM

The SBAPs provide information and assistance to small businesses on matters of:

- Determining applicable requirements under the Act and permitting assistance.
- The rights of small businesses under the Act.
- Compliance methods and acceptable control technologies.
- Pollution prevention and accidental release prevention and detection.
- Audit programs.

2.3 COMPLIANCE ADVISORY PANEL

The CAPs are created at the state level and are comprised of at least seven members:

- 2 members who are not owners of small business stationary sources -- selected by the Governor to represent the public.
- 2 members who are owners of small business stationary sources -- selected by the lower house of the state legislature.
- 2 members who are owners of small business stationary sources -- selected by the upper house of the state legislature.
- 1 member from the state air pollution permit program -- selected by the head of that agency.

The responsibilities of the CAP are to:

- Render advisory opinions concerning the effectiveness of the SBTCP, difficulties encountered, and degree and severity of enforcement.
- Report on the compliance of the SBTCP with the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act.
- Submit periodic reports to EPA's SBO.
- Review information for small business stationary sources to ensure it is understandable to the layperson.

2.4 EPA's RESPONSIBILITIES UNDER SECTION 507 OF THE CAA

Section 507(d), *Monitoring*, directs the EPA to monitor the SBTCPs and to provide a report to Congress. This responsibility has been delegated to EPA's SBO, whose oversight duties are to:

- Render advisory opinions on the overall effectiveness of the SBTCP, difficulties encountered, and degree and severity of enforcement [507(d)(1)].
- Make periodic reports to Congress on the compliance of the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act [507(d)(2)].
- Review information issued by the SBTCPs to ensure that it is understandable to the layperson [507(d)(3)].
- Have the federal SBAP serve as the secretariat for the development and dissemination of reports and advisory opinions [507(d)(4)].

Further information on the activities and accomplishments of EPA's Office of the Small Business Ombudsman may be found in Appendix B.

2.5 FEDERAL SMALL BUSINESS ASSISTANCE PROGRAM

EPA, through the Federal SBAP, provides technical guidance for the use of the SBTCPs in the implementation of their programs. Information on the activities of the Federal SBAP may be found in Appendix C.

3.0 SBTCP STATUS, BUDGETS, STAFFING, AND ORGANIZATION

This section presents information on the operating status (Section 3.1), budgets (Section 3.2), staffing levels (Section 3.3), and the administrative location of the three components of the SBTCPs (SBOs, SBAPs, and CAPs) within their states/territories (Section 3.4) for the January - December 1996 reporting period.

A listing of state/territory Ombudsman, SBAP, and alternate SBAP contacts is included in Appendix D-1.

3.1 OPERATING STATUS

Importantly, by December 31, 1996, 50 SBOs (94 percent of the 53 states and U.S. territories) and 52 SBAPs (98 percent) had been established and were providing assistance to small businesses. Only 36 programs reported that their CAPs were operating; however, 41 programs reported that the CAPs had been established.

The number of established and operational SBO functions remained at 50, the same as 1995. The number of established SBAPs was up from 50 in 1995 to 52 in 1996; the number of operating SBAPs has risen from 49 in 1995 to 52 in 1996. One more CAP was established in 1996 (41, up from 40 in 1995), and 4 additional CAPs became operational (36 in 1996 versus 32 in 1995).

Operating status for each of the three components of the SBTCPs is shown in Table 3-1 and also identifies those programs whose SBOs, SBAPs, and CAPs are not yet established or operational.

TABLE 3-1 OPERATING STATUS OF THE SBTCP COMPONENTS				
	COMPONENTS ESTABLISHED¹		COMPONENTS OPERATIONAL¹	
	# Programs	% Programs	# Programs	% Programs
SBO²	50	94	50	94
SBAP³	52	98	52	98
CAP⁴	41	77	36	68

- Note 1:** Programs indicated if their SBO, SBAPs, or CAPs had been established (i.e., created by legislation), and if they were also providing services. Programs were considered operational if the SBOs had been appointed, SBAPs were providing services, and CAPs had conducted at least one meeting, even if not all CAP members had been appointed.
- Note 2:** As of 12/31/96, SBOs were reported not to be established or operating in Hawaii, Massachusetts or Vermont.
- Note 3:** As of 12/31/96, an SBAP was reported not to be established or operating in Hawaii.
- Note 4:** As of 12/31/96, CAPs were reported not to be established or operating in 12 programs: Alabama, California, Delaware, Hawaii, Illinois, Iowa, Maryland, Massachusetts, New York, Rhode Island, Vermont, or the U.S. Virgin Islands. In addition, 5 other states reported that their CAPs had been established, but not yet operating: Arizona, District of Columbia, Missouri, New Jersey, and Tennessee.

Details on actual dates (month/year) when the SBOs, SBAPs, and CAPs were reported to be established and operational may be found in Appendix D-2. A summary of the start of operations for the three SBTCP functions is shown in Table 3-2.

TABLE 3-2 START OF OPERATIONS FOR SBTCP FUNCTIONS						
	SBO		SBAP		CAP	
	Number	Total	Number	Total	Number	Total
Pre-1990			1	1		
1991			1	2		
1992	12	12	11	13	1	1
1993	20	32	17	30	8	9
1994	10	42	16	46	12	21
1995	8	50	5	51	10	31
1996			1	52	5	36
% operational by 12/31/96	94%		98%		68%	

3.2 BUDGETS

3.2.1 1996 Reporting Period

As detailed in the paragraphs and tables below, the total operating budgets for the SBTCPs varied from \$0 to over \$2,000,000 for the 1996 reporting year. These

extremes include \$0 for Vermont, whose SBO/CAP have not yet begun operations, to New York, reporting a total operating budget of \$2,170,000

1996 operating budget ranges for the SBTCPs are shown in Table 3-3. Details on the operating budgets, by program, for the individual SBO, SBAP, and CAP components, including the source of these funds, may be found in Appendix D-3.

TABLE 3-3 1996 SBTCP OPERATING BUDGET RANGES		
BUDGET \$	# Programs	% Programs ¹
0	1	2
1 - 100,000	9	17
100,001 - 200,000	19	36
200,001 - 300,000	5	9
300,001 - 400,000	9	17
400,001 - 500,000	2	4
500,001 - 600,000	2	4
600,001 - 700,000	1	2
700,001 - 800,000	0	0
800,001 - 900,000	2	4
900,001 - 1,000,000	0	0
> 1,000,000 ²	1	2
> 2,000,000 ³	1	2
Report submitted, no data provided ⁴	1	2
TOTAL	53	

Note 1: County budgets are not combined with state budgets, nor are they counted separately.
 Note 2: Texas
 Note 3: New York
 Note 4: Hawaii

The balance of this section provides summary details on the operating budgets for the SBOs, SBAPs, and the CAPs.

3.2.2 SBO Operating Budgets

37 SBOs have their own budgets (versus having their budgets combined with other SBTCP functions). Budgets for these SBOs are concentrated in a range below \$200,000, with 36 of 37 SBOs (97 percent) reporting budgets between \$0 and \$200,000. (The one exception is New York's SBO, who reports a budget of \$1,170,000.) The primary source of funding for all programs is Title V fees (58 percent), which are collected at the state/territory level. Other sources of funding include EPA 105 Grant funds (provided for in Section 105 of the CAA, these funds flow to the states through EPA regional offices), non-Title V air fees, and state permit fees.

The range of 1996 operating budgets for the SBOs with their own budgets is shown in Table 3-4.

TABLE 3-4 1996 SBO OPERATING BUDGET RANGES (37 non-combined budgets)		
Budget (\$)	# Programs	% Total Programs
0 - 25,000	10	19
25,001 - 50,000	6	11
50,001 - 75,000	7	13
75,001 - 100,000	6	11
100,001 - 200,000	7	13
>1,000,000	1	2
Combined budgets ¹	11	21
Report submitted, no data provided ²	5	9
TOTAL	53	

Note 1: 11 SBOs have combined budgets. If a program combined the budget for two SBTCP functions (i.e., SBO/SBAP, SBO/CAP, or SBAP/CAP), they were counted as having a combined budget. However, the budget of the third component of the program also was tallied separately (e.g., a program reporting a combined SBO/CAP budget and a separate SBAP budget was tallied in the "combined budget category" for the SBO/CAP budget and with SBAPs for the SBAP budget). 11 SBOs have combined budgets.

Note 2: Hawaii, Louisiana, Massachusetts, Vermont, Virgin Islands.

3.2.3 SBAP Operating Budgets

37 SBAPs have their own budgets. SBAP budgets are spread across a wider dollar range as compared to the SBOs with 16 of 37 programs (43 percent) between \$0 and \$100,000, 5 of 37 programs (14 percent) between \$100,001 and \$200,000, and 6 of 37 programs (16 percent) between \$200,001 and \$300,000. Title V fees again are the main funding source (66 percent of all programs); funds from EPA 105 Grants, non-Title V fees, indirect funds, and permit fees are also used to support SBAPs.

The range of 1996 operating budgets for the SBAPs with their own budgets is shown in Table 3-5.

TABLE 3-5 1996 SBAP OPERATING BUDGET RANGES (37 non-combined budgets)		
Budget (\$)	# Programs	% Total Programs
0 - 25,000	2	4
25,001 - 50,000	2	4
50,001 - 75,000	6	11
75,001 - 100,000	6	11
100,001 - 200,000	5	9
200,001 - 300,000	6	11
300,001 - 400,000	5	9
400,001 - 500,000	3	6
600,001 - 700,000	1	2
900,001 - 1,000,000	1	2
Combined budgets ¹	12	23
Report submitted, no data provided ²	4	8
TOTAL	53	

Note 1: 12 SBAPs have combined budgets. If a program combined the budget for two SBTCP functions (i.e., SBO/SBAP, SBO/CAP, or SBAP/CAP), they were counted as having a combined budget. However, the budget of the third component of the program also was tallied separately (e.g., a program reporting a combined SBO/CAP budget and a separate SBAP budget was tallied in the "combined budget category" for the SBO/CAP budget and with SBAPs for the SBAP budget). 10 SBAPs have combined budgets.

Note 2: Alabama, Hawaii, Nebraska, Vermont.

3.2.4 CAP Operating Budgets

32 CAPs have their own budgets. CAP funding ranges from \$0 (25 percent of programs with their own budgets) to a high of \$12,000 (one program, Missouri). 88 percent of CAPs with their own budget operate with a budget of \$5,000 or less. Title V fees are the most commonly listed funding source for all CAPs (45 percent).

The range of 1996 CAP operating budgets is shown in Table 3-6.

TABLE 3-6 1996 CAP OPERATING BUDGET RANGES (32 non-combined budgets)		
Budget (\$)	# Programs	% Total Programs
0	8	15
1 - 1,000	4	8
1,001 - 2,000	3	6
2,001 - 3,000	4	8
3,001 - 4,000	1	2
4,001 - 5,000	8	15
9,001 - 10,000	3	6
11,001 - 12,000	1	2
Combined budgets ¹	10	19
Report submitted, no data provided ²	11	21
TOTAL	53	100

Note 1: 10 CAPs have combined budgets. If a program combined the budget for two SBTCP functions (i.e., SBO/SBAP, SBO/CAP, or SBAP/CAP), they were counted as having a combined budget. However, the budget of the third component of the program also was tallied separately (e.g., a program reporting a combined SBO/CAP budget and a separate SBAP budget was tallied in the "combined budget category" for the SBO/CAP budget and with SBAPs for the SBAP budget). 8 CAPs have combined budgets.

Note 2: Alabama, District of Columbia, Hawaii, Iowa, Kansas, Maine, Maryland, Massachusetts, Nebraska, New York, Virgin Islands.

3.2.5 Comparison of Previous and Projected Budgets

A comparison of budgets from 1995, 1996, and 1997 (projected) is valuable in tracking program growth and resource allocation. Programs were asked to indicate significant budget changes (greater than 10 percent) from year to year and to provide insight into any major shifts (more than 10 percent) in funding levels. SBTCP reporting period budget comparisons are shown in Table 3-7.

TABLE 3-7 SBTCP REPORTING PERIOD BUDGET COMPARISONS								
	BUDGET DECREASE (> 10% change)		BUDGET CONSISTENT (< 10% change)		BUDGET INCREASE (> 10% change)		INSUFFICIENT DATA FOR COMPARISON ¹	
	# Programs	% Programs	# Programs	% Programs	# Programs	% Programs	# Programs	% Programs
1995 to 1996 Reporting Period	7	13	30	57	14	26	2 ²	4
1996 to 1997 Reporting Period	2	4	36	68	11	21	4 ³	8

Note 1: Not all programs provided budget amounts. 4 programs may have had an established SBTCP during the previous reporting period or were unable to project their budgets for the next reporting period. In order to establish trends, combined budgets for the SBO, SBAP, and CAP were examined. This was necessary, as some programs indicate combined budgets for two or three facets of their programs, while other programs may have had one or two facets of their programs inactive during the previous reporting period.

Note 2: Hawaii, Louisiana

Note 3: Hawaii, Louisiana, Massachusetts, Missouri

In reviewing the combined budgets for the SBO, SBAP, and CAP functions of the SBTCPs, 14 programs (26 percent) indicate a budget increase (of at least 10 percent) from the 1995 to 1996 reporting periods. 11 programs (21 percent) show an increase from the 1996 to 1997 reporting periods.

As programs mature and the cost of establishing programs stabilizes, more programs are projecting fairly consistent budgets for the next reporting period (35 this year as compared to 25 last year). The number of programs projecting a budget increase for the subsequent reporting period has declined from 15 last year to 11 this year.

According to responses received, budget increases primarily were related to the growth and expansion of SBTCP services and staff additions. Examples of reasons given for budget increases greater than 10 percent are provided below:

- In Illinois, the budget has grown as program staffing increased to 5 FTE. The funding source was Title V permit fees, and outreach activities have increased. (\$330,000/1996, \$485,000/1997)
- Ohio's SBAP hired one additional FTE in June 1996, and new budgets reflect one additional staff member. Both SBO and SBAP operated at lower than expected levels due to lower than expected revenues from Title V fees. (\$498,000/1996, \$625,000/1997)
- West Virginia's SBO has significantly increased participation in trade shows and professional organizational events. This has raised travel and display costs. SBAP substantially increased on-site visits and compliance audits. Staff participated in more multimedia training workshops. An increase is projected in 1997 due to dedicating more resources for developing general permits. (\$160,000/1996, \$215,000/1997)

30 programs (57 percent) report steady budget levels (less than a 10 percent change) for the 1995 to 1996 reporting periods, and 35 programs (66 percent) indicate consistent budget levels from the 1996 to 1997 reporting periods.

7 programs (13 percent) showed a decrease (more than 10 percent) from the 1995 to 1996 reporting periods, and only 2 programs (4 percent) project a decrease from the 1996 to 1997 periods. Budget reductions are often attributed to program reorganizations and consolidations and lower projected costs to maintain a program (versus the higher resource requirements to develop a program).

87 percent of the programs reported either a consistent or increasing budget from the 1996 to 1997 reporting periods.

Budgets for the 1995, 1996, and 1997 reporting periods for the SBO function, SBAP function, and CAP function may be found in Appendix D-4.

3.3 STAFFING LEVELS

41 programs (77 percent) report operating their SBOs with 2 or fewer full-time equivalents (FTEs) as shown in Table 3-8.

37 programs (70 percent) operate their SBAPs with 4 or fewer FTEs, which include both paid and unpaid staff and may include retired engineers. There are some notable exceptions to these staffing levels, such as Louisiana, Indiana, and California, which report using 11, 12, and 20 FTEs, respectively, to support their SBAP function.

Specific details on the number of FTEs, by program, for the SBO and SBAP functions may be found in Appendix D-5.

TABLE 3-8 STAFFING LEVELS (as FTEs ¹) SERVING THE SBO & SBAP FUNCTIONS				
# FTEs	SBO		SBAP	
	# Programs	% Programs	# Programs	% Programs
0	1	2	0	0
0.1 - 1	28	53	14	26
1.1 - 2	12	23	10	19
2.1 - 3	4	8	9	17
3.1 - 4	1	2	4	8
4.1 - 5	1	2	5	9
5.1 - 6	1	2	2	4
6.1 - 7			2	4
7.1 - 8	1	2	1	2
9.1 - 10			1	2
10.1 - 11			1	2
11.1 - 12			1	2
19.1 - 20			1	2
TOTAL ²	49		51	

Note 1: An FTE is considered to work 40 hours/week. For example, 2 people working 20 hours/week would be equivalent to 1 FTE.

Note 2: 2 states (Florida and Texas) combined their SBO and SBAP functions and report 4 and 19.5 FTEs, respectively. Massachusetts and Puerto Rico did not provide information on their SBOs.

58 percent of programs (up from 49 percent last year) report that at least the required 7 members have been appointed to their CAPs. An overview of CAP appointments

is shown in Table 3-9. Program statistics of the number of CAP members in each category (small business, state agency, general public, not yet appointed, other) may be found in Appendix D-6.

TABLE 3-9 CAP APPOINTMENTS		
	# Programs	% Programs
Minimum 7 members appointed	31	58
Less than 7 members appointed¹	20	38
No response²	1	2
Not established³	1	2

Note 1: A number of states indicated that expired terms on their CAPs have not been filled.

Note 2: California

Note 3: Hawaii

3.4 ADMINISTRATIVE LOCATION OF SBO AND SBAP COMPONENTS

As shown in Table 3-10, 51 programs indicated that their SBOs are located within a state/territory-related agency, typically the environmental agency (not necessarily a regulatory section). (Two programs whose SBO functions are not operational indicated the intended location for this function. Ohio's program reports their SBO is housed in an independent, non-regulatory, financing agency.) The majority of programs (50) report to have located their SBAPs within a state/territory-related agency, typically the environmental agency.

As defined in Section 507, the CAPs are to be independent entities, operating outside of any agency. In addition to this independent status, 15 programs also indicated that administrative support is provided to the CAPs by some facet of their state environmental agency or SBO/SBAP.

TABLE 3-10 ADMINISTRATIVE LOCATIONS OF SBO AND SBAP				
Location	SBO		SBAP	
	# Programs ¹	% Programs	# Programs ¹	% Programs
State-related agency	51	96	50	94
University-related (contracted)			2	4
Private contractor			1	2
Independent	1	2		
Not established	1	2		
TOTAL	53	100	53	100

Note 1: Numbers are higher than those reported in Table 3-1. Programs without established SBOs or SBAPs indicated where those functions are intended to be located once established.

Complete information for the administrative location of each SBO, SBAP, and CAP may be found in Appendix D-7.

4.0 SBTCP ACTIVITIES AND SERVICES

Information regarding the services and activities of the three components of the SBTCPs is provided in this section. Industry sectors assisted by the SBTCPs are discussed in Section 4.1. An overview of SBO, SBAP, and CAP activities and services is provided in Section 4.2. SBTCP financial assistance services are outlined in Section 4.3. A discussion of how programs leverage resources and minimize duplication of efforts may be found in Section 4.4. SBTCP efforts to comply with the Paperwork Reduction Act, Regulatory Flexibility Act, and the Equal Access to Justice Act are summarized in Section 4.5.

4.1 INDUSTRY SECTORS ASSISTED BY THE SBTCPs

47 SBTCPs (89 percent) (county and air district programs were not counted separately) provided specific information on the types of industry sectors and number of facilities that their programs assisted in 1996. Small businesses in 121 industry sectors were identified as having been assisted by SBTCPs. Certain industry sectors, such as dry cleaning and vehicle maintenance and repair, received larger numbers of assists, as these sectors are strongly impacted by the CAA. Programs also may have targeted certain industry sectors for assistance based on their anticipated impact by the CAA and the number of small businesses in that industry sector.

The top ten industry sectors receiving assistance (general and on-site) by SBTCPs in 1996 were:

- Other (not classified)
- Auto Body Maintenance/Refinishing/Repair
- Dry Cleaners/Laundry Services
- Wood Products/Furniture/Finishing
- Printing/Graphic Arts
- Metal Fabrication/Finishing/Forging/Casting
- Attorney/Consultant/Engineer
- Manufacturing
- Gasoline Distribution (Wholesale/Retail)
- Boilers.

The top ten industry sectors that received on-site assistance were:

- **Auto Body Maintenance/Refinishing/Repair**
- **Other (not classified)**
- **Dry Cleaning/Laundry Services**
- **Wood Products/Furniture/Refinishing**
- **Printing/Graphic Arts**
- **Metal Fabrication/Finishing/Forging/Casting**
- **Construction/Contractors**
- **Gasoline Distribution (Wholesale/Retail)**
- **Manufacturing**
- **Plastic Manufacturing/Products.**

The top ten industry sectors that received assistance from the most programs were:

- **Dry Cleaning/Laundry Services (37 programs)**
- **Auto Body Maintenance/Refinishing/Repair (36 programs)**
- **Printing/Graphic Arts (32 programs)**
- **Metal Fabrication/Finishing/Forging/Casting (27 programs)**
- **Wood Products/Furniture/Finishing (25 programs)**
- **Attorney/Consultant/Engineer (17 programs)**
- **Gasoline Distribution (Wholesale/Retail) (16 programs)**
- **Other (not classified) (16 programs)**
- **Chrome Plating (15 programs)**
- **Construction/Contractors (14 programs).**

Industry sectors that received the most overall types of assistance generally received the greatest number of on-site visits. In comments provided by the SBTCs, the majority indicated that the most notable improvements in compliance were the result of on-site visits.

A list of the industry sectors receiving assistance (by number of programs) may be found in Appendix E-1. This same list also has been reordered by total number of assistance efforts (Appendix E-2) and by on-site assistance efforts (Appendix E-3).

Individual program responses by number of general, on-site, and total assists are shown in Appendix E-4. The fifteen most active programs, with over 1,000 assistance efforts (as tallied by specific industry sectors) were:

- **California**
- **Colorado**
- **Connecticut**

- Indiana
- Iowa
- Massachusetts
- Missouri
- Oklahoma
- Pennsylvania
- Tennessee
- Texas
- Utah
- Virgin Islands
- Washington
- Wisconsin.

4.2 PRINCIPAL SBO, SBAP, AND CAP ACTIVITIES AND SERVICES

An overview of activities and services provided by the three SBTCP functions is discussed in this section.

4.2.1 SBO Activities and Services

Outreach services offered by the SBOs during the 1996 reporting period are summarized in Table 4-1. Outreach activities offer a means of informing the small business community about the technical assistance services available from SBOs and providing technical information to small businesses.

The three most common SBO activities (by the number of SBOs offering such services) were meetings, speaking engagements, and distribution of brochures/flyers. 37 SBOs (70 percent) have telephone hotlines.

**TABLE 4-1
SBO OUTREACH ACTIVITIES**

ACTIVITY	# Programs¹	% Programs
Meetings	40	75
Speaking engagements	36	68
Brochures/flyers	30	57
Training sessions	28	53
Personal assistance (including toll-free hotlines)	10	19
Information booths	6	11
On-site visits	6	77
Newsletters	5	9
Media coverage	5	9
Other ²	16	30

Note 1: Does not include county or regional activities.

Note 2: SBO activities classified as "other" included:

- Fact sheets
- Fax back service
- Tracking legislation
- Focus groups/task forces
- Permit and regulatory guidance documents
- Teleconferences
- Site visits
- Visit to another CAP for training.

Detailed information, by program, about the number of occurrences and the number of people reached by each reported SBO activity is presented in Appendix E-5. Details of the SBOs toll-free hotlines are shown in Appendix E-6.

4.2.2 SBAP Activities and Services

An aggregate of the outreach services offered by the SBAPs during the 1996 reporting period is presented in Table 4-2. These outreach services/activities are designed to introduce the available assistance services to small businesses, provide general information, and identify common problems and issues to be addressed on a more specific basis.

The four most common outreach services offered by at least 80 percent of SBTCPs were:

- Seminars, workshops and meetings
- General assistance (including assistance provided via telephone hotlines)
- Distribution of printed materials such as factsheets
- On-site consultations.

These were the four most common services in 1995 as well.

TABLE 4-2 SBAP OUTREACH ACTIVITIES		
ACTIVITY	# Programs	% Programs
Seminars, workshops, meetings, etc.	49	92
General assistance (including telephone hotlines)	49	92
Fact sheets, manuals, etc.	44	83
On-site consultations	44	83
Telephone hotlines	42	79
Bulletin board services/World-Wide Web page	31	58
Permit and compliance assistance	12	23
Teleconferences	9	17
Newsletters	9	17
Pollution prevention assistance	5	9
Other ¹	15	28

Note 1: SBAP services classified as "other" included the following:

- Meetings with regulatory permit assistance centers
- Surveys
- Fax back and on line service
- Media interviews
- Targeted letters and mass mailings
- Referrals
- EPA initiative meetings
- Customer meetings
- Special projects
- Visit to another CAP
- Loan program
- Resource centers
- Enforcement negotiations
- Notifications
- Trade shows
- Amnesty programs.

Detailed information, by program, about the number of occurrences and the number of people reached by each SBAP during the 1996 reporting period is shown in Appendix E-7. 42 SBAPs (79 percent) offered telephone hotline services for their

customers (both toll free and non-toll free). SBAP telephone hotline information is listed in Appendix E-8.

Of particular note is the number of SBAPs that are using Bulletin Board Services (BBSs) and World Wide Web (WWW) home pages to disseminate technical assistance information. 28 programs are currently using BBSs or home pages, up from 13 last year. (County/regional air district programs operating their own home pages are counted as one with the state.) An additional 6 states indicated they plan on launching home pages in 1997.

The types of information available via these BBSs or home pages are listed in Table 4-3; detailed information on the BBSs and home pages, by program, may be found in Appendix E-9.

TABLE 4-3 INFORMATION AVAILABLE ON SBAP BBS AND WWW PAGES		
Type of Information	# Programs	% Programs (of 31)
Regulations	25	81
Pollution prevention	23	74
Factsheets	13	42
Application forms	11	35
Calendar of events	10	32
Guidance documents	9	29
Program description/information	9	29
Contact listings	8	26
Policies	8	26
Permit information	5	16
Emission inventory/information/spreadsheets/calculations	4	13
Other ¹	18	58

Note 1: "Other" information available from SBAP bulletin boards includes:

- Multimedia information
- Newsletters
- Free downloadable software
- List of publications
- Links to relevant sites

- Downloadable technical information
- Public notices/rulemakings
- CAP meetings
- Environmental education.

BBSs (which are becoming less common) and Internet home pages are efficient mechanisms for SBTCPs to disseminate information to small businesses, as evidenced by the increasing use of electronic media over the last year. Because the Internet and BBSs are also efficient ways to transfer information from the federal SBO and SBAP, between SBAPs, and to the small business community, increased access to the Internet should continue to be pursued by SBAPs.

4.2.3 CAP Activities and Services

36 CAPs were operational during the 1996 reporting period, 34 of which reported activities. The primary CAP activity, as reported by 20 CAPs, was to suggest effective outreach activities. This was closely followed by review of SBTCP documents and review of SBO/SBAP outreach activity efforts (each reported by 19 CAPs).

Major activities of the CAPs during the 1996 reporting period are summarized in Table 4-4. A program summary of CAP activities may be found in Appendix E-10.

TABLE 4-4 MAJOR CAP ACTIVITIES		
Activity	# Programs	% Programs
Suggest effective outreach activities	20	38
Review SBTCP documents	19	36
Review of SBO/SBAP outreach efforts	19	36
Appoint staff/elect officers	12	23
Define CAP responsibilities	10	19
Review/comment on new regulations, policies, etc.	10	19
Suggest effective outreach activities	6	11
Attend training seminars, conferences, etc.	5	9
Other ¹	17	32

Note 1: Less frequently-reported CAP activities classified as "other" included:

- Leveraged resources through trade associations, vendors, suppliers, and small business publications.
- CA Air Quality Rules were revised to reflect CAP length of service and structure.
- Reviewed and commented on various new programs and personnel.
- Reviewed reports on assistances to dry cleaners and upcoming state regulatory calendar.
- Met with trade associations.
- Developed legislative strategy for small business loan program.
- Helped SBO evaluate nominees for small business award program.
- Reviewed and instructed staff to prepare letter of concern on auto repair facility technician training.
- Spoke at local civic and business group meetings.
- Sponsored workshops.
- Assisted with cross media program for cleaning contaminated dry cleaning sites.
- Collaborated to develop brochures and P2 guidance documents.
- Participated in Region X Success Methods Survey.
- Assessed current state initiatives regarding ISO 14000.

CAPs are pursuing many diverse avenues in becoming effective partners in the technical assistance programs. The unique roles and specialized skills of the members make them valuable resources in the development of the SBTCPs. Effective communication among the three components of the programs and among CAPs in all programs will continue to effectively and efficiently define the role of the CAP and fully maximize the skills of CAP members in assisting small businesses. The value added activities of these CAPs underscore the need for states without operational CAPs to complete the appointment process and initiate the CAP function.

4.2.4 SBO/SBAP/CAP Meetings

As shown in Table 4-5, SBTCPs have recognized the importance of meetings among the three functions to ensure effective coordination of efforts and use of resources. Two-thirds of SBOs and SBAPs have scheduled meetings at least quarterly, and almost one-half of programs report scheduled meetings among SBOs, SBAPs, and CAPs at least once a year.

TABLE 4-5
FREQUENCY OF MEETINGS AMONG SBOs, SBAPs, AND CAPs
(number of programs reporting such frequency)

Frequency	SBO & SBAP	SBO & CAP	SBO, SBAP, & CAP	SBAP & CAP
Daily	14			
Weekly	4			
Bi-weekly	6	1	1	1
Monthly	5	2		
Bi-monthly	1		1	
Quarterly	3	8	13	8
Bi-annually	2	3	4	4
Annually	1	1	5	4
Occasionally	8	5	4	3
TOTAL	39	20	28	20

Meetings between SBOs and SBAPs were the most common form of contact, occurring in 39 programs (74 percent). A majority of these meetings (31 of 39 programs or 79 percent) were regularly scheduled, with frequencies ranging from daily to annually. The most commonly scheduled frequency of meeting between SBOs and SBAPs, reported for 14 of the 39 programs (36 percent), was daily.

Meetings between SBOs and CAPs were reported for 38 percent of programs (20 of 53). The majority of these meetings, 15 of 20 (75 percent), were regularly scheduled. The most common frequency of meetings between SBOs and CAPs was quarterly, reported for 8 of 20 programs, or 40 percent.

28 programs (53 percent) reported meetings involving SBOs, SBAPs, and CAPs. Most of these meetings, 24 of 28 (86 percent), were regularly scheduled, and the common frequency was quarterly, reported for 13 of 28 programs (46 percent).

Meetings between SBAPs and CAPs were reported in 20 programs (38 percent), the same frequency as meetings between the SBO and CAP. Of these, 17 of 20 (85 percent) were regularly scheduled, and the most common frequency was quarterly, reported for 8 of 20 programs (40 percent).

Detailed information, by program, about meetings between SBTCP functions, is presented in Appendix E-11.

4.3 SBTCP FINANCIAL ASSISTANCE PROGRAMS

Information about financial assistance programs offered to small businesses to address environmental compliance needs is provided in Table 4-6.

TABLE 4-6 FINANCIAL ASSISTANCE PROGRAMS	
	#
Programs offering grants/loans	6
Grants/loans offered	8 ¹
Programs planning grant/loan programs	10

Note 1: Some SBTCPs offer more than 1 financial assistance program.

8 financial assistance programs were offered by 6 of 53 SBTCPs (11 percent) during the 1996 reporting period. 10 SBTCPs have plans to offer financial assistance programs to small businesses in the near future. This is down from 14 financial assistance programs offered by 10 states in 1995. Detailed information about these financial assistance programs is provided in Appendix E-12.

Only 11 percent of SBTCP programs offer some type of financial assistance to help small business with capital expenses associated with pollution prevention or control equipment. Creative financing mechanisms fulfill a need conveyed to programs by small businesses; offering financial assistance was a common recommendation made for improving compliance by SBTCPs themselves. The addition of grant or loan programs planned by 10 additional states will be of great benefit to small businesses in these states.

4.4 LEVERAGING OF RESOURCES AND MINIMIZING DUPLICATION OF EFFORTS

Programs reported on the extent to which they leverage resources within their state/territory, as discussed in Section 4.4.1. SBTCP strategies to exchange information and resources with other programs is provided in Section 4.4.2.

4.4.1 Leveraging of Resources

Information provided in this section is vital to understanding how some programs with limited budgets and resources are functioning. Generally, programs report that all three components of their SBTCPs recognize the efficiency and value of coordinating their efforts with each other and with other environmental agency departments, state agencies, and organizations. A summary of the number of SBTCP functions that leverage resources is shown in Table 4-7. Descriptions of how programs leverage resources for their SBOs, SBAPs, and CAPs may be found in Appendix E-13.

TABLE 4-7 PROGRAMS THAT REPORT LEVERAGING OF RESOURCES FOR SBTCP FUNCTIONS		
	# Programs	% Programs
SBO	46	87
SBAP	46	87
CAP	20	38

46 programs (87 percent) indicate some level of leveraging resources for the SBO function. The SBO often coordinates information development and dissemination, training, and workshops/seminars with such entities as other state agencies, Chambers of Commerce, trade associations, non-profits, public utilities, and Small Business Development Centers. The overall concerns of small businesses are being taken into account, as many SBOs provide multimedia information, coordinate outreach with non-air programs, or intervene on behalf of a small business with other agencies. Some SBOs also serve in other roles within the state environmental agency.

46 programs (87 percent) indicate some level of leveraging resources for the SBAP function in order to maximize their programs' effectiveness. Strategies and sources of assistance are quite similar to those used by the SBOs.

20 CAPs (38 percent) report leveraging resources within their state/territory. While the CAPs, by design, are independent entities, many receive administrative support and technical resources from the state/territory environmental agency, the SBO, or the SBAP. Many CAPs also report receiving a small level of funding for travel and per diem expenses.

4.4.2 Minimizing Duplication of Efforts Among SBTCPs

49 programs (92 percent) report some action to minimize duplication of efforts among SBTCPs. The sharing or exchanging of information among SBTCPs is a practical method for avoiding duplication of effort, thus increasing the overall cost-effectiveness of individual programs. As an example, industry-specific information developed by one program would have wide applicability to other programs involved with similar industries. Mechanisms that SBAPs employ to avoid duplication of effort are presented in Table 4-8; program details for this topic are found in Appendix E-14.

TABLE 4-8 SBTCP MECHANISMS FOR AVOIDING DUPLICATION		
Mechanism	# Programs	% Programs
Review of documents from other sources	41	77
Contact with other SBTCPs within EPA regions	30	57
Contacts with state and regional air groups	25	47
Communication with other SBTCPs	23	43
Gathering of information from electronic sources	18	34
Review of EPA documents and/or contact with EPA	17	32

The most common technique (in 77 percent of programs) employed by SBAPs to avoid duplication of effort was review of documents from various other public,

private, or university sources. This facilitated the exchange of ideas and allowed programs to identify those documents that they could adapt for their own use.

The second most common method for avoiding duplication was contact with other programs within the same EPA region through conference calls and other means. This technique was utilized during the 1996 reporting period by 30 programs (57 percent).

Gathering information from electronic sources, including use of the Internet for information transfer, may be the most promising mechanism for avoiding duplication of effort among SBAPs. This method increased in use in 1996 and was reported by 18 programs, up from 8 in 1995. This parallels the rise in the number of web pages available, as previously noted. Posting of information from the federal SBO and SBAP, other private and university sources, and state SBAPs facilitate efficient use of resources and would encompass all of the mechanisms currently utilized by SBAPs for avoiding duplication.

4 programs (8 percent) reported taking no specific actions to avoid duplication of efforts during the 1996 period.

4.5 SBTCP COMPLIANCE WITH SECTION 507(d)(2)

Section 507(d)(2) of the CAA requires EPA's SBO to periodically report to Congress on SBTCP actions to follow the intent of the provisions of the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act. EPA's SBO has conducted a number of significant outreach actions toward assisting the SBTCPs in this effort.

Key EPA SBO outreach activities under the CAA Section 507(b) pursuant to these statutes include:

- Conducted educational activities at the EPA SBO Regional Liaison Conference, Arlington, VA, August 1996.

- **Provided information on statutes at the 1996 National/State SBO/SBAP Conference.**
- **Responded to telephone hotline inquiries in regard to the three statutes.**
- **Distributed copies of the three statutes by request to state contacts.**
- **Provided states with copies of the 1996 Small Business Regulatory Enforcement Fairness Act (SBREFA), which strengthens and amends the Regulatory Fairness Act.**

4.5.1 SBTCP Activities Associated with the Paperwork Reduction Act

32 programs (60 percent) reported specific activities associated with the intent of the Paperwork Reduction Act, up from 22 programs in 1995. This Act was designed to minimize the burden and maximize the practical utility and public benefit associated with the collection of information by or for a federal agency.

The two most common action taken to follow the intent of the provisions of this act were development of simplified/consolidated permits or forms and CAP review of SBTCP documents to monitor compliance with this Act. In addition, SBTCPs are developing general permits for particular industry sectors and providing and receiving information electronically. Producing concise, easy-to-read documents that summarize regulatory issues also was cited as an effective activity, since these summaries eliminate the need for small businesses to have copies of full legislative documentation. Overall, these actions show that many SBTCPs have continued to take significant steps during the 1996 reporting period in following the intent of the provisions of the Paperwork Reduction Act.

Actions taken by SBTCPs in following the intent of the provisions of the Paperwork Reduction Act are listed in Table 4-9 and are detailed, by program, in Appendix E-15.

TABLE 4-9 SBTCP ACTIVITIES TO FOLLOW THE INTENT OF THE PAPERWORK REDUCTION ACT		
Activity	# Programs	% Programs
Simplified/consolidated permits and/or forms	12	23
Routine review of documents for compliance	11	21
Receiving/providing documents electronically	11	21
Producing concise, easy-to-read summary documents	10	19
Use of general industry-specific permits	9	17
Increasing exemptions for "insignificant" activities	6	11

4.5.2 SBTCP Activities Associated with the Regulatory Flexibility Act

27 programs (51 percent) reported activities to follow the intent of the provisions of the Regulatory Flexibility Act during 1996, as shown in Table 4-10. The Regulatory Flexibility Act requires that when a number of regulations will have a significant economic impact on a substantial number of small entities, "a regulatory analysis must be performed to explore options for minimizing those impacts."

TABLE 4-10 SBTCP ACTIVITIES TO FOLLOW THE INTENT OF THE REGULATORY FLEXIBILITY ACT		
Activity	# Programs	% Programs
Assessing impact of new regulation, policies, etc.	16	30
Routine review of documents for compliance	11	21
Simplified/consolidated permits and/or forms	7	13
Use of general industry-specific permits	6	11
Increased exemptions for "insignificant" activities	4	8
Amnesty program	2	4

SBTCPs have played a major role in ensuring awareness of the effects of regulatory requirements on small businesses as well as promoting environmental compliance in the small business community. SBTCP personnel made significant strides in

promoting the effects of legislation/regulations on small businesses to regulatory agencies through their role as mediators between these two groups. The primary activity reported by programs in following the intent of the Regulatory Flexibility Act (16 programs, or 30 percent) was the review and comment on new air regulations to evaluate their impact on small businesses. SBTCPs continue to be effective advocates of the small business perspective and have helped negotiate flexible application of regulatory requirements that provided great benefits to small businesses. Actions taken by SBTCPs in response to the Regulatory Flexibility Act, by program, may be found in Appendix E-16.

4.5.3 SBTCP Activities Associated with the Equal Access to Justice Act

18 programs (34 percent) reported specific activities to follow the intent of the provisions of the Equal Access to Justice Act, whose purpose is to provide certain parties who prevail over the Federal government with covered litigation in an award of attorneys' fees and other expenses under appropriate circumstances. Specific actions include the routine review of SBTCP documents by CAPs (the most common activity, conducted by 9 programs), the establishment of pro bono legal services, and the provision of technical assistance to groups aggrieved by permit actions of a regulatory agency.

SBTCP actions to follow the intent of the provisions of the Equal Access to Justice Act are shown in Table 4-11 and detailed, by program, in Appendix E-17.

TABLE 4-11 SBTCP ACTIVITIES TO FOLLOW THE INTENT OF THE EQUAL ACCESS TO JUSTICE ACT		
Activity	# Programs	% Programs
Routine review of documents for compliance	9	17
Offering pro bono legal services	1	2
Providing technical assistance for groups aggrieved by regulatory actions	1	2
Other ¹	9	17

5.0 PROGRAM EFFECTIVENESS

External assessments of the SBTCPs' program effectiveness are reviewed in this section. Comments regarding the SBTCP are discussed in Section 5.1. Complaints received by SBTCPs and resolution strategies are presented in Section 5.2. Finally, program highlights and accomplishments are found in Section 5.3.

5.1 COMMENTS RECEIVED BY SBO OR CAP ON SBTCP

37 programs (70 percent) reported that comments were received by their SBOs or CAPs on the SBTCP. Comments were overwhelmingly positive, generally expressing appreciation for the availability of services and the way in which these services were provided. A detailed list of comments received by SBOs and CAPs on their SBTCPs is presented in Appendix F-1.

Common themes repeated by small business clients of numerous programs include:

- Appreciation for knowledgeable, responsive, non-regulatory assistance with environmental issues.
- Expressions that SBTCP services filled an existing need in the small business community for personalized guidance through the many regulatory processes involved in compliance. Many small businesses cited specific SBO/SBAP staff members for their dedicated and professional service.

5.2 COMPLAINTS RECEIVED BY SBO OR CAP AND RESOLUTION STRATEGIES

SBTCP staff members fill an important role as facilitator or mediator between small business owners/operators and regulatory agencies, enhancing communication to promote understanding and sensitivity on both sides. Based on information reported, most problems seem to be resolved when businesses have someone to turn to for non-regulatory assistance, advice, and effective liaison with regulatory agencies. Information was requested about complaints or issues raised by small business representatives about SBTCP services and how these issues were resolved. Lessons learned by one program can be shared with other programs, which thereby can benefit from these experiences.

27 programs (51 percent) provided examples of complaints received and resolution strategies employed. Only 1 program (2 percent) indicated that specific complaints had not been resolved.

Major themes of the issues reported have not changed significantly from the last reporting period.

- A need for improved communication between businesses and regulatory agencies.
- Requests for simplified forms and procedures.
- Confusion by small business as to which regulations applied to them, how these regulations affected their specific operations, and how they can be met in a time- and cost-effective manner.
- The need for specialized one-on-one assistance for identifying and completing paperwork associated with regulatory requirements and submitting it on schedule.
- The need for flexibility in applying regulations to small businesses (e.g., the use of general permits, amnesty programs, exemptions).
- Overwhelming number of regulations.
- Desire for financing assistance programs.

Resolution strategies similar to those noted last year were employed and usually involved SBTCP personnel:

- Providing "plain English" explanations of regulatory requirements.
- Giving one-on-one guidance through the paper work processes.
- Facilitating communication about flexibility and compliance assistance issues between businesses and regulatory agencies.
- Investigating, developing, or institutionalizing financial assistance programs.
- Developing confidentiality policy for those concerned with seeking assistance.

A list of specific issues addressed by SBOs and CAPs and actions taken to resolve the concerns expressed by the complainants is presented in Appendix F-2.

5.3 PROGRAM HIGHLIGHTS AND ACCOMPLISHMENTS

41 SBTCPs (77 percent) reported on important accomplishments, awards, and recognitions for their work with the small business community.

The SBTCPs have facilitated dialog and improved trust between the regulatory agencies and small businesses. Many programs have forged strong partnerships with such groups as trade associations, small business development centers, and small business associations to broaden outreach efforts to the small business community. Many states also have developed industry-specific initiatives that include compliance manuals, workshops, and on site visits.

In this section, key accomplishments are highlighted based on the frequency in which they were mentioned. An overview of program accomplishments and highlights for 1996 are provided in Appendix F-3.

- 1. Forging partnerships with other organizations and agencies was mentioned by 25 (47 percent) of the programs as being a significant accomplishment.**
 - Georgia's SBO/SBAP joined with government, industry, and trade organizations to sponsor 20 workshops in 1996.**
 - In Louisiana, the SBO and SBAP cooperated with the Louisiana State University Forestry Laboratory and Department of Economic Development to organize a full day wood furniture small business exposition with the EPA teleconference as the focal point.**
 - The Ohio SBO's major accomplishments in 1996 centered on building solid working relationships with the Printing Industry of Ohio, Ohio Small Business Council, Ohio Chamber of Commerce, Ohio Bakers Association, Ohio Cleaners Association, Ohio Cast Metals Association, Ohio Chemical Council, National Federation of Independent Businesses Ohio, Automobile Service Association of Ohio, Ohio Petroleum Marketers Association, and Ohio Council of Retail Merchants.**
- 2. Sponsorship of or making presentations at workshops and forums was highlighted by 18 programs (34 percent).**
 - The District of Columbia's SBAP indicated they reach more people by attending trade associations' annual seminars and making presentations. SBAP made a presentation at the Korean Drycleaners Association's annual seminar, which was attended by 700 business owners and their employees.**

- Kansas conducted a well-received series of Air Emission Inventory and Class II Permit Application Assistance workshops.
 - Michigan's SBAP conducted 6 workshops on the state's Renewable Operating Permit Program.
 - Rhode Island's Pollution Prevention Conference and Expo attracted over 700 attendees in 1996 and provided SBO, SBAP, and CAP information on large scale.
3. Improved synergy between the regulatory agency and small business was noted by 17 programs (32 percent).
- In New Hampshire, presentations to three industry trade associations that previously were reluctant to allow a "regulatory" speaker to attend their meetings resulted in a number of requests for on site assistance.
 - North Carolina noted a 100 percent increase in technical assistance, including on-site assistance, to wood furniture companies, service stations, dry cleaners, small boat manufacturers, metal plating companies, and others.
 - Washington state's YRCCA held a series of meetings with feedlot operators to discuss complaints, concerns, and opinions for a dust control abatement process. Procedures were suggested for voluntary compliance.
4. 13 programs (25 percent) were pleased with the publication of various documents.
- With funding from a Leadership Grant, Florida developed Environmental Facility Survey Guidance manuals for multimedia environmental audits.
 - Minnesota's SBAP participated in a workgroup to develop a compliance guide for the wood furniture manufacturing NESHAP's work practice standard.
 - New Jersey published a Small Business Directory of Information, which is available in hard copy or through the DEP BBS.
5. Awards and grants also have been received by individual programs that have displayed exceptions vision and leadership. 9 programs (17 percent) reported receiving awards or grants.
- Arkansas' program received the 1996 Distinguished Service Award from the Arkansas Environment Federation.
 - Maryland's program received recognition of appreciation at the 1996 awards dinner of the Korean Drycleaners Association of Maryland and the Korean Drycleaner Association of Greater Washington.

- Oklahoma received the Ecos Award for their Customer Assistance Program.
6. 8 programs (15 percent) reported involvement in regulatory/permitting developments and negotiations.
- Iowa noted that after two years of meetings, a revised, streamlined version of their construction permits should go to the printer in March 1997.
 - Mississippi's SBO and SBAP, in conjunction with the Air Toxics section of the Air Division, are developing simplified versions of Air Permit Applications for perc and petroleum dry cleaners.
 - New York's SBTCP was directly involved in negotiations on rewriting the state's general permitting regulations that produced a registration system for minor sources that simplifies permitting with a one-page, no calculations form; a general permit application for sources that can cap out of Title V; and a major source Title V application.

6.0 COMPLIANCE ASSURANCE ISSUES

EPA's Office of Enforcement and Compliance Assurance (OECA) requested information on the effectiveness of the SBTCPs in providing compliance assistance to small businesses. Common compliance problems are discussed in Section 6.1, improvements in regulatory understanding and compliance are detailed in Section 6.2, and recommendations to facilitate compliance are outlined in Section 6.3. Program confidentiality issues are outlined in Section 6.4.

6.1 COMMON COMPLIANCE PROBLEMS

51 SBTCPs (96 percent) provided insight on the types of compliance issues addressed during the course of providing technical assistance to small businesses.

Common compliance problems, listed by decreasing occurrence, are shown in Table 6-1 and are detailed, by program, in Appendix G-1.

TABLE 6-1 COMMON COMPLIANCE PROBLEMS		
Compliance Problem	# Programs	% Programs
Not understanding regulatory requirements	28	53
Operating without a permit	26	49
Incomplete record keeping	16	30
Uncertain of permitting requirements	14	26
Uncertain how to determine emission inventories/lack technical expertise	12	23
Financing for control requirements	10	19
Uncertain how to complete forms/complicated paperwork	10	19
Operating outside NSPS or MACT	10	19
Improper storage/disposal of hazardous waste	7	13
Fear of arbitrary regulatory enforcement/regulatory agency	6	11
Failure to use or finding proper equipment/technology to comply with applicable standards	6	11
Multiple permitting requirements/need for multi-media permits	5	9

Examples of less frequently-cited compliance concerns as identified by small businesses and programs are shown below.

- Overwhelmed by the quantity and complexity of regulations.
- Lack of sufficient notification by or getting straight answers from the regulatory agency.
- No manifest for special or hazardous waste.
- Uncertain as to which government agency to contact and when to contact that agency.
- Improper labeling of storage areas.
- Noncompliance, since risk of inspection and penalty seem remote.

6.2 IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE

Programs reported on their observations of improvements in understanding and awareness of regulatory requirements, behavioral changes, and environmental improvements (if tracked) that they feel have resulted from their compliance assistance activities.

49 programs (92 percent) provided insight as to improvements in regulatory understanding and compliance. The most common responses, listed by number and percentage of programs, are provided in Table 6-2 and are detailed, by program, in Appendix G-2.

**TABLE 8-2
IMPROVEMENTS IN REGULATORY UNDERSTANDING**

Response	# Programs	% Programs
More open communication between sources and agencies	30	57
Increased compliance	20	38
Greater understanding/awareness of regulations	18	34
Reduced apprehension of regulatory agencies and environmental compliance	12	23
Improved attitude about compliance	12	23
Increased registration and permitting of existing sources	11	21
Improvements in pollution prevention practices	10	19
Promotion of compliance through on-site visits	10	19
Better record keeping	4	8
Involvement by business in regulatory development process	2	4
Businesses including compliance strategies early in their business plans	1	2
Recycling and reuse	1	2
Better hazardous waste disposal	1	2

Generally, businesses want to comply with environmental regulations; however, they may be afraid to ask for assistance. When a non-threatening assistance program, such as the SBTCP, is available, small businesses are most anxious to take advantage of the services. The SBTCPs have offered important one-on-one contacts, which have provided valuable information to those who were previously unaware of their compliance requirements. Such information included: the need to have operating permits and how to obtain and complete them; the need to maintain records; and information on available compliance options such as reformulation, pollution prevention, or control equipment.

SBTCPs help small business understand how the regulations apply to their operations/facilities and offer information on the available alternatives to achieve voluntary compliance. Two of the top three most common compliance problems mentioned by small businesses, "not understanding regulatory requirements", and

"operating without a permit", were represented positively by facilities as compliments to program effectiveness, with programs reporting "greater understanding and awareness of the regulations," and "improved communication between sources and agencies." This indicates that the SBTCPs are working to understand the small business community and provide quality service where it is most needed.

10 programs reported that the most notable improvements in compliance have been a result of on-site visits, up from 3 programs in 1995. Many of the businesses visited by the SBAP were not aware of regulations or pollution prevention opportunities and were eager to be given a chance to comply without the threat of enforcement action.

Two other areas attributed to improvements in regulatory understanding that showed strong increases were increased registration and permitting of existing sources(as reported by 11 programs, up from 5 in 1995) and improved pollution prevention practices (doubling from 5 programs in 1995 to 10 in 1996).

Texas and Virginia reported specific improvements in compliance as a result of their outreach efforts to specific industry sectors.

- In Texas in 1996, 1,780 businesses in the wood products industry were contacted by SBAP to promote compliance. Because of this outreach, proper handling of hazardous waste rose by 73 percent, completion of hazardous waste determinations increased by 1 percent, waste related recordkeeping was up by 43 percent, transport of hazardous wastes off site within the required time limits improved by 77 percent, and disposal of hazardous waste at an approved facility showed a 52 percent rise.**

The SBAP also conducted site visits in the auto body industry. The average initial compliance rate was 72 percent. Following initial assessments, SBAP made follow up visits to measure compliance, which was found to have improved to 88 percent. Also, SBAP site visits saved each auto body shop an average of \$1,200 through reduced costs for materials, consulting fees, and avoided penalties.

- In Virginia, there is a strong relationship of compliance assistance activity to the awareness and acceptance by the existing regulated or newly regulated community. Virginia saw with dry cleaners in 1994 that their acceptance of responsibility to comply with regulations was a direct result of their understanding of the requirements, the cost of compliance, the benefits of compliance, and that there was a willing party to provide information and assistance outside a perceived hostile environment. The June 1994 deadline for initial notification reports was met by 73 percent of Virginia dry cleaners. Continued cooperation between the state and interested trade associations**

ensured wide coverage of compliance assistance activities and workshops, consistency of information, and follow up. Notification report compliance reached approximately 84 percent in October 1996.

Virginia also provided insight that reflects the sentiment of many state programs:

- We are finding that a large part of the success of any outreach assistance is a continued interest in and delivery of a non-regulatory assistance message to the affected source population. This includes concise, understandable materials; a recognition of the minimal available time for a source to participate in outside activities beyond daily business; and the provision of options for compliance. All these are critical to the success of a compliance assistance effort. Results of compliance assistance activity will not necessarily yield verifiable results immediately. Compliance assistance activity should be viewed as a system, a support system that will yield incremental results arriving at full compliance.

6.3 RECOMMENDED CHANGES TO FACILITATE SMALL BUSINESS COMPLIANCE WITH THE CAA

Recommendations made by 45 SBTCPs for changes, at the state or federal level, that would help small businesses comply with the CAA are summarized in Table 6-3. SBTCP staff members are uniquely qualified to make such recommendations, since they address current CAA compliance problems encountered by small business and attempt to provide effective solutions. Specific responses, grouped by category and listed by program, may be found in Appendix G-3.

**TABLE 6-3
SBTCP RECOMMENDATIONS FOR IMPROVING COMPLIANCE**

Recommendation	# Programs	% Programs
Allow flexibility/simplification in applying regulations to small businesses	22	42
Multimedia pollution control and compliance assistance	14	26
Increased funding/continued adequate funding for SBTCPs	14	26
Mechanisms for financing pollution control equipment	13	25
Expand/facilitate effective communication between state and federal agencies	12	23
Promote compliance assistance versus enforcement	9	17
Expand advertising to increase program exposure	8	15
Avoid duplication of effort in compliance assistance activities	6	11
Generic outreach and training materials	6	11
Use of Internet for information transfer	6	11
Develop plain language materials	6	11

85 percent of all of programs (45) provided at least one recommendation for changes to improve small business compliance with the CAA. Several of these recommendations reflect dominant themes repeated in data relating to SBO/SBAP outreach activities, CAP activities, and comments from small businesses, methods of avoiding duplication. Priority of responses for 1996 parallel those of 1995. Allowing flexibility and simplification in applying regulations to small businesses was mentioned by 22 programs (42 percent) as being the prime recommendation for improving compliance.

Another common recommendation stressed by 26 percent of SBTCPs involves the expansion of technical assistance into a multimedia effort, addressing small business concerns about groundwater, soil, and hazardous waste issues. Many states have already expanded their programs to encompass multimedia assistance or are planning to do so in response to small business requests.

The third most common recommendation, mentioned by 14 programs, was for continued and increased funding for the state SBTCPs. As previously noted, a

number of states operate with limited budgets and staffs. The personalized approach to technical and compliance assistance has been shown to be effective in reaching the small business community, and 26 percent of state programs believe that adequate financial resources are vital to continued and expanding high quality service.

6.4 PROGRAM CONFIDENTIALITY AND CONFLICT OF INTEREST

In early 1995, EPA's SBO worked with the SBTCPs and EPA's Office of Enforcement and Compliance Assurance to reach an agreement regarding the confidentiality of assistance provided to businesses via the SBTCP.

Programs were asked how they avoid conflicts of interest (COI) and maintain confidentiality, particularly in those cases where the SBAP is located within the regulatory agency.

41 programs (77 percent) report no problems with COI or confidentiality issues. 5 programs (9 percent) indicate that no confidentiality program or guarantee of confidentiality is in place, while 3 programs (6 percent) indicated possible perception problems with confidentiality or COI. 4 programs did not respond to the question.

Program structures range from guaranty of confidentiality (more common) to providing no confidentiality. For example, assistance programs may be housed in non-regulatory departments, or a program may refer a business in need of technical assistance to such a provider that will guaranty confidentiality. Most programs provide for confidentiality of trade secrets. Many programs have policies that protect small businesses from penalties if violations are discovered during the course of their receiving technical assistance. Program responses to the issue of COI may be found in Appendix G-4.

The following example responses reflect the range of COI issues and resolutions (from having an established confidentiality policy to having no such policy).

- In Colorado, the SBO is located in an agency independent of the air pollution regulatory agency, so the problem has not presented itself. SBAP is located in the air pollution regulatory agency; however, they are removed from the

enforcement section of their department. As of yet, a problem has not occurred.

- Georgia's SBAP avoids the discussion and review of confidential materials with compliance and enforcement personnel. When in discussions with other programs in EPD about a small business client, business names are not used or circumstances are presented and assurances are secured before any sensitive materials are disclosed.
- In Wyoming, the problem of COI or that SBAP does not have confidentiality has not been resolved internally or externally. CAP recommended that confidentiality is necessary for an effective SBAP; however, the department has maintained that state statute prohibits confidentiality, since all received information must be available to the general public, other than trade secrets. CAP believes that the result of this impasse is a less than effective SBAP where the bottom line is to provide compliance and technical assistance to the small business community. The Department initiated the drafting of its Small Business Voluntary Disclosure and Incentive Rule that provides penalty waivers for small businesses that voluntarily disclose non-compliance and work with the Department to achieve compliance.
- In Utah, several concerns have been expressed regarding confidentiality issues. An outside program that advertised confidentiality was not considered to be confidential. After legislative review by the Utah Attorney General's office, it was determined that although a self-audit bill exists, it did not cover on site visits. Further, federal and state records are, in many cases, open and available for public review.
- In the District of Columbia, COI is inevitable, because the SBAP performs many other regulatory functions. SBAP also is a permit engineer who may recommend enforcement actions for noncompliance of her permit conditions. SBO is not a regulator and has no appearance of conflict.

APPENDIX A

1996 ANNUAL REPORTING FORM

**STATE SMALL BUSINESS STATIONARY SOURCE
TECHNICAL AND ENVIRONMENTAL COMPLIANCE
ASSISTANCE PROGRAM (SBTCP)**

**ANNUAL REPORTING FORM
FOR THE PERIOD 1/1/96 TO 12/31/96**

**OMB NO.: 2060-0337
EXPIRATION DATE: 7/31/98**

INSTRUCTIONS FOR COMPLETING THIS FORM

Enclosed is a blank copy of the Annual Reporting Form for the State Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP). The questions are the same as those asked last year, but they have been reordered to mirror the presentation of information in the 1995 SBTCP Report to Congress; there are now five sections instead of six. To streamline the reporting, this Form is designed to collect standardized information on each of the three components of the SBTCP, listed below, in a single document.

- Small Business Ombudsman (SBO)
- Small Business Assistance Program (SBAP)
- Compliance Advisory Panel (CAP)

The period of time covered by this first report is January through December 1996.

For your convenience, electronic copies of the form are provided on the enclosed disk in WordPerfect (SBTCP96.WP) and Microsoft Word (SBTCP96.DOC). Table 3-1 also is provided on disk in a spreadsheet format in Lotus123 (TABLE3-1.WK3) and Microsoft Excel (TABLE3-1.XLS).

Please answer the questions on this Form, and return the disk and a completed hardcopy of the Reporting Form using the enclosed, pre-addressed mailer.

If this mailer is missing, please return the disk and a completed hardcopy to:

**Ms. Karen V. Brown
Small Business Ombudsman
U.S. Environmental Protection Agency (1230C)
401 M Street, SW
Washington, D.C. 20460**

ATTN: SBTCP Annual Report

If you use your own mailer, please include on the mailer the words, "Electronic Media Enclosed."

Completed forms are due by February 15, 1997.

If you have any comments or questions regarding this form, please contact the U.S. EPA Small Business Ombudsman (EPA SBO) at the numbers listed below. The SBO can be reached Monday through Friday from 8:30 a.m. to 5:00 p.m. (EST). After these hours, messages can be left on an answering machine, which is connected to the toll-free 800 number.

**(703) 305-5938 (Telephone)
(800) 368-5888 (Toll-free Hotline)
(703) 305-6462 (Facsimile)**

WHY ARE WE REQUESTING THIS FORM?

As part of the Clean Air Act CAA as amended in 1990, the U.S. Congress included, as Section 507, the requirement that each state establish a Small Business Stationary Source Technical and Environmental Compliance Assistance Program (SBTCP) to assist small businesses in complying with this Act.

As part of its normal reporting requirements to Congress, EPA will also provide the Congress with a report on the SBTCP program, including overall effectiveness, difficulties encountered, and the degree and severity of enforcement. EPA has internally delegated responsibility for completion of this report to its Small Business Ombudsman (EPA SBO).

The EPA SBO intends to use the information contained in this Form, as reported by the states, to prepare the Report to Congress, including the need for such technical assistance programs and how they should be changed, if necessary. The goal of this Form is to standardize the information reported by the state SBTCPs.

Any suggestions or recommendations to improve this reporting format would be appreciated. Please feel free to contact EPA's SBO to discuss any recommendations using the address and telephone numbers listed on page 1.

SUGGESTIONS FOR COMPLETING THIS FORM

- Gathering information for this report is definitely a team effort! You may wish to provide hard copies of this form to key contacts from the SBO, the SBAP, and the CAP, and indicate who will be responsible for the various parts of the report. Once all information is collected, one person should take responsibility for completing and submitting this form (most likely the SBO).
- We are looking to collect objective information on each state SBTCP. This report is not meant to be an evaluation of any facet of your program.
- The period covered by this report is January through December 1996.
- We are seeking information you should be already collecting for your own purposes. We are not asking you to create information you do not have. If a question asks for information you do not have, please provide a brief explanation as to why the information is not available.
- You may wish to refer to last year's report for reference in completing this year's reporting form.
- For future reports, you are encouraged to continually gather your statistics during the reporting period. Based on the information requested in this Form, you may need to revise the types of statistics you track for your SBTCP for subsequent years.

SECTION 1 SOURCE OF THE INFORMATION

This section is designed to collect standardized information about the state SBTCPs completing this Form, and whom to contact if we should have any questions.

1.1 Name of state or territory for which this report is being submitted.

--

1.2 Period of time (calendar year) covered by this report.

1996

1.3 Who should be contacted (primary and alternate contacts) if there are any questions regarding the information contained in this Form?

The most typical answer for this question will be the CAP Chairperson or the state Small Business Ombudsman. For the question "Relationship to SBTCP", we would like to know the relationship of that person to the SBTCP program (i.e., CAP Chairperson, SBO, etc.). Be sure to include the area code for the telephone and facsimile numbers. Also include a telephone extension if appropriate.

	PRIMARY CONTACT	ALTERNATE CONTACT
Name		
Title		
Relationship to SBTCP		
Organization		
Address		
Address		
City, State, Zip		
Telephone Number		
Facsimile Number		

SECTION 2

STATUS, BUDGETS, STAFFING, ORGANIZATION

This section is designed to collect four types of standardized information about your state's SBTCP: Status, Budgets, Staffing Levels, and Organization. The information you provided in last year's report will be helpful in answering the questions in this section.

STATUS

2.1 When was your SBTCP established?

Please note that in Question 2.2, we are asking when each component of your SBTCP actually began to operate (provide services), which may be different.

SBTCP Component	Month and Year of Establishment
SBO	
SBAP	
CAP	

2.2 When did the SBTCP begin to provide operations (month and year)?

To be consistent, for the SBO, indicate the effective date (month/year) of appointment; for the SBAP, indicate the date (month/year) it began providing assistance to small businesses; and for the CAP, indicate the date (month/year) of the first meeting -- even if not all members of the CAP were appointed by the time of the first meeting.

SBTCP Component	Month and Year Operations Began
SBO	
SBAP	
CAP	

BUDGETS

2.3 Please provide summary information on the funding for each component of your state's SBTCP (for the period January through December 1996). Please indicate the source of funding.

For example, sources of funding might include: Title V fees, specific appropriation of state funds, the operating budgets of existing programs, or some combination.

These budgets should include direct salaries, fringe benefits, materials & supplies, etc. To keep it simple, please round your budgets to the nearest \$5,000.

	BUDGET (\$)	SOURCE OF FUNDING (please describe)
SBO		
SBAP		
CAP		

2.4 What was the SBTCP's budget in 1995? What is the expected SBTCP budget during the next reporting period (January through December 1997)?

As with the previous question, please round all numbers to the nearest \$5,000. If these programs did not exist (or were not active) in the previous reporting period, please complete this question with such words as, "inactive" or "did not exist."

	1995 BUDGET (\$)	1997 PROJECTED BUDGET (\$)
SBO		
SBAP		
CAP		

2.5 Briefly describe any significant changes (more than 10%) in the level of funding between the 1995, 1996, and 1997 annual budget periods.

For example, a previous period may have seen a high level of fines that were credited to the SBTCP program; perhaps Title V revenues were lower than projected; or state appropriations may have been reduced or eliminated.

--

STAFFING

With these questions, we are interested in knowing how many people are supporting each component of your state's SBTCP.

2.6 How many people, measured as full-time equivalents (FTEs), support the SBO function?

Please complete this question for the staffing levels that are current as of December 1996. An FTE is considered to work 40 hours/week. For example, 2 people working 20 hours/week would be equivalent to 1 FTE. It is possible that the SBO has other responsibilities and does not perform this function on a full time basis. For example, if they perform this function approximately 20 hours/week (or 50% of their time), this would be equivalent to an 0.5 FTE.

SBO Function	Number of FTEs
SBO	
Other staff (as FTEs)	

2.7 How many people, measured as full-time equivalents (FTEs), support the SBAP function?

Please complete this question for the staffing levels that are current as of December 1996. Use the same definition for an FTE as discussed in Question 2.6.

SBAP Function	Number of FTEs
All Staff	

2.8 With respect to the SBAP, how many of these people are paid or serve as (un-paid) volunteers?

Please complete this question based on the information in Question 2.7, also reporting the results as FTEs. The total should be the same as the total number of FTEs in Question 2.7.

SBAP Staff	Number of FTEs
Paid	
Un-paid Volunteers	

2.9 How many of the people identified in Question 2.7 would be considered retired engineers?

Please complete this question based on the information in Question 2.7, also reporting the results as FTEs. We are interested in knowing if the states are utilizing "retired engineer" programs (or their equivalent) to support the SBAPs.

SBAP Staff	Number of FTEs
Retired Engineers	

2.10 How many people are currently serving on your CAP?

Please answer this question by indicating how many people have been appointed to your CAP as of December 1996. Please indicate the affiliation of each CAP member (i.e., small business, state regulatory agency, general public, etc.)

If appropriate, please indicate the number of people who have not been appointed to your CAP as of December 1996.

When complete, this table should list a total of at least 7 people (including appointed and not yet appointed).

AFFILIATION	NUMBER OF PEOPLE ON CAP
Owner (or representative) of small business	
State regulatory agency	
General public	
Not yet appointed	
Other (please specify)	

ORGANIZATION

2.11 Please briefly describe where each component of your SBTCP is located/organized.

Please indicate if the component is located in a state regulatory agency, another state agency, a university, etc. For example, in some states, the SBAP is located within the state regulatory agency. If so, please list the name of the agency and the appropriate department, division, etc. (for example: Department of Environmental Protection, Bureau of Waste Management). If your state has subcontracted your SBAP to an outside company, please complete Question 2.13. In the case of the SBO, for example, some states have located this component within the Department of Commerce. Generally, the CAP is independent and is located outside of all agencies, with each individual appointed as defined in Section 507.

SBTCP COMPONENT	BRIEF DESCRIPTION OF ADMINISTRATIVE LOCATION
SBO	
SBAP	
CAP	

2.12 Has management of the SBAP been contracted to an outside company?

If YES, please complete Question 2.13.

YES	
NO	

2.13 Who is the outside company that is operating your SBAP?

For the section, "Budget During the Current Reporting Period", please complete for the time period January through December 1996. Please indicate (or estimate) the budget to the nearest \$5,000.

Company	
Address	
Address	
City, State, Zip	
Telephone Number	
Facsimile Number	
Project Manager (or principal point of contact)	
Budget During the Current Reporting Period	
Term of Contract	

SECTION 3

SERVICES PROVIDED/ACTIVITIES CONDUCTED

This section is designed to collect standardized information about the type and level of services provided by the three components of the state's SBTCP program: SBO, SBAP, and CAP. As you complete this section, please seek assistance from the SBAP (primarily) and CAP.

SMALL BUSINESS OMBUDSMAN

3.1 Does your state's SBO have a toll-free Hotline?

YES	
NO	

If YES, is the hotline number accessible nationally or in-state only?

National	
In-state only	

If YES, please list this number.

--

3.2 Briefly describe the state SBO's outreach program.

With this question we are interested in compiling statistics on the types and number of people reached through a variety of outreach activities by the SBO, such as meetings with trade associations, speeches, mailings, etc. during the 1996 reporting period.

A list of activities is sufficient, however, the number of occurrences of these activities when available is preferred (e.g., 12 speaking engagements reaching 160 people; 3 training seminars reaching 72 participants; preparation and distribution of 8 industry-specific brochures, 500 copies of each.

To help you in completing this question, the following table is provided in which you can list the number of occurrences and the number of people reached, if those statistics are available. If you only track whether these activities occurred (and not the specific number of occurrences), please simply indicate "YES" in the "DID THIS ACTIVITY OCCUR" column.

OUTREACH ACTIVITY	DID THIS ACTIVITY OCCUR? (YES OR NO)	# OF OCCURRENCES DURING REPORTING PERIOD	NUMBER OF PEOPLE REACHED
Meetings			
Speaking Engagements			
Brochures/Flyers			
Training Sessions			
Others (please specify)			

SMALL BUSINESS ASSISTANCE PROGRAM (SBAP)

3.3 What assistance services are offered by your state's SBAP?

At a minimum, we would like to compile a list of the services offered by your state's SBAP. The table below lists these services. Please check those boxes that apply, list additional services as appropriate and, if possible, indicate the number of services provided, and/or individuals/businesses reached.

ASSISTANCE SERVICE	SERVICE PROVIDED? (YES OR NO)	# OF SERVICES PROVIDED DURING THE REPORTING PERIOD	# OF INDIVIDUALS OR BUSINESSES REACHED
General Assistance			
On-Site Visits			
Seminars, Workshops, Meetings, etc.			
Factsheets, Manuals, Information Packets			
Others (please specify)			

NOTE: *If available, please include a list of documents, that were prepared and distributed by your SBTCP during the 1996 reporting period.*

Preferably, but only if you are maintaining such statistics, we would like to compile the number of businesses helped/reached by the SBAP's services (e.g., general assistance via telephone, letters, etc.; on-site consultations; seminars/workshops/meetings/etc.; distribution of factsheets/manuals/information packets/etc.) by three-digit Standard Industrial Classification (SIC) codes.

Please complete Table 3-1, which is attached. Electronic copies of this table are provided in both Lotus123 (TABLE3-1.WK3) and Excel (TABLE3-1.XLS) formats for your convenience.

3.4 Does your state's SBAP have a telephone Hotline?

YES	
NO	

If YES, is this a toll-free number?

YES	
NO	

If YES, is the number accessible nationally or in-state only?

National	
In-state only	

Please list the number.

--

3.5 Does the SBAP program services include an electronic bulletin board or Internet homepage?

YES	
NO	

If YES, what is the address of the bulletin board or homepage?

--

Please list what information is accessible through this bulletin board or homepage.

To make it easy to complete this question, the table below lists some possibilities. Please add additional items as appropriate.

Information Available Through the Bulletin Board or Homepage	Please check all appropriate boxes
Copies of regulations	
Information on P2 options	
Others (please specify)	

If your SBAP has an electronic bulletin board or homepage, please indicate, if available, its level of usage (i.e., how many times was it accessed during the 1996 reporting period)?

--

Was it helpful to its users?

With this question, we are asking if you have received ANY comments from the bulletin board or homepage users. Please indicate if any component of the SBTCP is soliciting feedback from users as to information/topics they would like to see on the bulletin board or homepage.

--

COMPLIANCE ADVISORY PANEL

3.6 What were the major activities of the CAP during this reporting period?

For example, the CAP may have: reviewed documents for readability, assessed small business concerns, reviewed technical assistance outreach efforts by the SBTCP, established procedures, or appointed a chairperson.

3.7 Please indicate the number of meetings that occurred between the SBO, SBAP, and CAP during the 1996 reporting period.

We are interested in comparing how much communication occurred between the different components of each state SBTCP during the 1996 reporting period, and if these were regularly scheduled or occasional meetings.

To make it easy to complete this question, the table below lists all possible combinations of meetings between these groups. For the question of "Frequency", please indicate if the meetings between these groups are regularly scheduled (i.e., monthly, quarterly, or biannually), or occasional.

MEETINGS BETWEEN WHOM	NUMBER OF MEETINGS DURING THE REPORTING PERIOD	FREQUENCY (Please indicate if monthly, quarterly, biannually, etc.)
SBO and SBAP		
SBO and CAP		
SBO and CAP and SBAP		
SBAP and CAP		

OTHER SERVICES/CONDUCT OF ACTIVITIES

3.8 Is your state planning a grant or loan program?

Please indicate if your state has or is planning a financial assistance program to help small businesses comply with the requirements of the CAA.

YES	
NO	

If YES, please indicate the date (month/year) such a grant or loan program became/will become available for each.

--

If YES, please indicate the funding levels for each grant or loan program.

NAME OF GRANT OR LOAN PROGRAM	FUNDING LEVEL

3.9 Briefly describe how each component of the SBTCP (i.e., SBO, SBAP, and CAP) leverages existing personnel resources (within the state).

This question is critical to understanding how some states, with limited budgets and resources (typically with the SBAP and SBO components) are functioning. For example, have personnel from any other departments been assigned to assist with the program?

SBTCP COMPONENT	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED
SBO	
SBAP	
CAP	

3.10 How does your state SBAP avoid duplication of efforts among other state SBTCPs?

With this question, we are hoping to find out to what extent states are sharing/exchanging information with other state SBTCPs. For example, what factsheets or information packets were developed by another state and used (with minimal editing) in your state?

3.11 Please briefly describe what actions were initiated by your SBTCP/CAP to follow the intent of the provisions of the Paperwork Reduction Act, the Regulatory Flexibility Act, and the Equal Access to Justice Act.

One of the responsibilities of the CAP is to critique the SBTCP in following the intent of the provisions of these three federal acts.

SECTION 4 PROGRAM EFFECTIVENESS

The questions in this section are designed to collect some external assessments of the SBTCP's program effectiveness and how it is providing a useful service.

We suggest that the questions in this section be completed by either the SBO or the CAP.

4.1 What were some comments (positive or negative) received by the SBO or the CAP on the SBTCP?

To answer this question, we are looking for comments that the SBO or CAP may have received. Additionally, you might wish to attach copies of relevant letters, memos, etc. that your office received.

4.2 What was the nature of the complaints received/initiated by the SBO or the CAP, and how were they resolved?

By collecting some representative information on the type of complaints received and how they were addressed, we believe that there may be some lessons learned that could be shared with other state SBTCPs.

COMPLAINTS	RESOLUTION OF COMPLAINTS

4.3 Please feel free to include any information about your program that you would like to highlight (i.e., significant accomplishments, awards, recognitions, etc.)

To answer this question, please invite the SBO, SBAP, and the CAP to include any information they believe is appropriate. Use as much space as necessary.

SECTION 5 COMPLIANCE ASSURANCE

The first three questions in this section have been included at the request of EPA's Office of Enforcement and Compliance Assurance (OECA).

- 5.1 What is the total number of eligible facilities identified by your program, by industry sector, that have received assistance by your program from January through December 1996?**

NOTE: An eligible facility is defined as a stationary source that: (1) is owned and operated by a person that employs 100 or fewer individuals; (2) is a small business concern as defined by the Small Business Act; (3) is not a major stationary source; (4) does not emit 50 tons or more per year of any regulated pollutant; and (5) emits less than 75 tons per year of all regulated pollutants.)

Please distinguish between general assistance and on-site assistance. What percentage is this of the total eligible pool of facilities? Please photocopy the table on the next page if additional space is needed.

[illegible]

[illegible]

5.2 What are the most common compliance problems identified by the facilities?

In the course of providing technical assistance, what have been the most common compliance issues addressed? Examples of compliance problems may include incomplete reports, lack of permits for new equipment or changes in processes, operating outside of MACT standard, or unpermitted emissions. Please indicate if certain problems are prevalent in any particular industry sector.

5.3 What have been the improvements in understanding and awareness of regulatory requirements, behavioral changes, and environmental improvements (if tracked) that have resulted from your compliance assistance activities?

From the perspective of the SBAP and SBO, what changes have you seen in businesses as a result of your technical assistance activities? Do you see a relationship between your activities (on-site consultations, hotline, seminars, publications, etc.) and improvements in compliance? Please use as much space as necessary.

5.4 What changes would you recommend, at either the state or federal level, to assist small businesses to comply with the CAA?

Please list any suggestions you have. We intend to compile the list of recommendations and highlight these in the report to Congress.

5.5 Briefly describe how the SBTCP avoids internal or external conflicts of interest (COI) or perception that this program may not be confidential. Briefly describe any issues that may have developed and how they were resolved.

In early 1995, EPA's SBO worked with the SBTCPs and EPA's Office of Enforcement and Compliance Assurance to reach an agreement regarding the confidentiality of assistance provided to businesses via the SBTCP.

With this question we are interested in knowing how the states are avoiding COI and maintaining confidentiality – particularly in those cases where the SBAP is located within the regulatory agency.

A large, empty rectangular box with a black border, intended for the user to provide a detailed response to the question regarding conflicts of interest and confidentiality.

This is the end of the 1996 SBTCP Annual Reporting Form. Thank you, and all contributors, for the completeness and accuracy of your state's Report. A copy of the EPA 1996 Report to Congress will be provided upon its submittal.

APPENDIX B

FEDERAL SMALL BUSINESS OMBUDSMAN

APPENDIX B
OFFICE OF THE EPA SMALL BUSINESS OMBUDSMAN

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF THE SMALL BUSINESS OMBUDSMAN
401 M STREET, SW (1230-C)
WASHINGTON, DC 20460
800-368-5888
703-305-5938 (in DC area)
703-305-6462 (fax)

The Office of the Small Business Ombudsman serves as an effective conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency. The Office reviews and resolves disputes with EPA and works with EPA personnel to increase their understanding of small businesses in the development and enforcement of environmental regulations.

The SBO's primary customer group is the nation's small business community. Significant secondary customer groups include state and EPA regional small business ombudsmen and national trade associations serving small businesses.

In response to the identified needs of the Office's target customer groups, the SBO has undertaken a variety of major outreach efforts including:

- Serving as liaison between small businesses and the EPA to promote understanding of Agency policy and small business needs and concerns.
- Staffing a small business hotline that provides regulatory and technical assistance information.
- Maintaining and distributing an extensive collection of informational and technical literature developed by the various EPA program offices.
- Making personal appearances as a speaker or panelist at small business-related meetings.
- Interfacing on an on-going basis with over 45 key national trade associations representing several million small businesses and with state and regional ombudsmen who serve businesses on the local level. Also in contact with over 400 additional national organizations that represent millions of small businesses.
- Providing guidance on the development of national policies and regulations that impact small businesses.

The SBO actively seeks feedback on its responsiveness to small business' inquiries and ever-evolving needs, primarily in the areas of technical assistance and advocacy. The SBO can "package" relevant information for the most effective and efficient delivery -- be it through training seminars, fact sheets, or position papers -- to its target audience.

Individual outreach activities are tracked and reported by the SBO on a monthly basis. Key statistics include numbers and types of hotline calls and written inquiries; nature and results of small business advocacy efforts; and personal appearances at conferences, seminars, and training sessions. Random, informal quality checks of customer satisfaction ensures that program performance meets or exceeds customer expectations.

The SBO also serves as the Agency's Asbestos Ombudsman. Information concerning asbestos management may be obtained through the same toll-free hotline service as that which serves small business needs.

SBO STAFF

EPA's Small Business Ombudsman is Karen V. Brown, who was appointed to this position by Administrator Lee Thomas in 1985. In 1988, she was named the Agency's Asbestos Ombudsman in addition to her small business duties. Ms. Brown has served the Agency since 1981 holding a series of management positions. She is a graduate biologist and chemist.

Robert C. Rose, an Industrial Engineer, joined the Office of Asbestos and Small Business Ombudsman as Deputy Ombudsman in 1991. He has over 26 years of management service with EPA.

Staff Assistants to the Ombudsman are James Malcolm, Chemical Engineer; Arnold B. Medbury, P.E., Mechanical Engineer; Larry O. Tessier, P.E., Civil Engineer; and Thomas J. Nakley, Civil Engineer.

TOLL-FREE HOTLINE SERVICE

The Ombudsman operates a toll-free hotline for the convenience of small businesses, trade associations, and others seeking access to the Ombudsman. A member of the Ombudsman's staff will answer between 8:30 AM and 4:30 PM EST. Message-recording devices for calls during non-business hours and overload periods are provided. All calls are personally handled on a fast turn-around basis.

The toll-free hotline number is:

- 800-368-5888
703-305-5938 (in DC area)

Callers request information on a variety of topics including:

- **Clean Air Act regulations**
- **Underground storage tank notification**
- **Small quantity generator requirements**
- **Effluent standard guidelines**
- **Used oil**
- **Asbestos compliance**
- **Waste minimization/pollution prevention**
- **Pesticide registration fees**

Increases in the number of direct-dial calls and hotline calls (from 4,000 calls per year in the early 1980s to the current level of 1,100 - 1,500 calls per month) and the associated distribution of technical and informational literature, growth in requests for personal appearances at conferences and workshops, and an expansion in participation in policy-making activities are evidence of the customer groups' confidence in the integrity and proactive stance of the SBO.

REGULATORY TRACKING AND ANALYSIS

The SBO performs a careful review of all proposed regulatory actions published in the biannual regulatory agenda to make a prima facie determination of small business impact. From the agenda, certain proposed regulations are selected that appear to have the potential for adverse impact on small businesses. In 1996, the SBO reviewed and monitored 28 regulatory actions with some significant degree of intensity. In all instances, the SBO endeavored to minimize the requirements (especially reporting and record keeping) on small businesses. Equally significant is the level of voluntary compliance with EPA regulations by the small business community as a result of the rapport established between the Ombudsman and trade associations during the developmental phase of the regulations.

MAJOR INITIATIVES IN 1996

The SBO's efforts to assist the small business community continue at a high level. Key accomplishments and activities for 1996 (some of which are on-going) include:

- **Hosted third National Small Business Ombudsman and Technical Assistance Program Conference, which was attended by 44 states and 2 territories (162 participants). Set plans for a fourth conference in early 1997.**
- **Developed external stakeholder guidance and acted as a principal participant in the Agency's Fifth Regulatory Tiering (prioritizing) Process.**
- **Served as principal role player in the development of a new EPA policy offering compliance initiatives to small businesses in all media (e.g., waste, water, toxics).**

- Coordinated individual meetings and follow-up meetings among major small business trade associations and the EPA Administrator, Deputy Administrator, and four Assistant Administrators to discuss small business issues.
- Developed small business regulatory impact studies for several small business trade associations.
- Participated as key player in the joint Small Business Administration and Office of Management and Budget Regulatory Reform Initiative.
- Developed, in cooperation with the University of Tennessee's Industrial Services Center and the EPA Office of Air Quality Planning and Standards, a Fourth National Satellite Teleconference on Wood Furniture Manufacturing, which was held in Fall 1996.
- Initiated formal on-site environmental auditing/assessment education and training program at the February 1996 National Small Business Ombudsman and Technical Assistance Conference.
- Developed, in cooperation with all State and Territorial Small Business Assistance Programs, EPA's 1995 Small Business Ombudsman Report to Congress under the 1990 Clean Air Act Amendments.
- Managing Small Business Regulatory Enforcement Fairness Act of 1996 Small Business Entity Outreach Sub-group to implement Act requirements.
- Conducted meeting for State Small Business Ombudsmen and Technical Assistance Program "Steering Committee" with Assistant Administrator, Office of Air and Radiation on small business issues and a "show and tell" for EPA, other Federal agencies, and small business trade associations.

APPENDIX C

FEDERAL SMALL BUSINESS ASSISTANCE PROGRAM

APPENDIX C

EPA'S FEDERAL SMALL BUSINESS ASSISTANCE PROGRAM

The EPA provides technical guidance for the use of the states/territories in the implementation of their programs. The Federal Small Business Technical Assistance Program (Federal SBAP) is coordinated by the Information Transfer Group (ITG) of the Office of Air Quality Planning and Standards (OAQPS). Other EPA programs participating in activities to assist the states include the Office of Compliance and the Pollution Prevention Division.

ELECTRONIC ACCESS

The Federal SBAP is actively involved in expanding the use of electronic media as a tool for access to EPA information by small businesses, state SBAPs, and the general public.

- The SBAP home page on the World Wide Web, part of the Technology Transfer Network, provides access to EPA small business assistance information and materials. Links to other small business-related sites are also provided. The SBAP home page address is www.epa.gov/ttn/sbap.
- The SBAP home page serves as a communication link for state SBAPs and includes a list of state and EPA small business program contacts. The home page also provides an forum to share information and outreach materials developed specifically for small businesses.
- The Office of Air and Radiation, Policy and Guidance home page, also part of the Technology Transfer Network, contains proposed and final rules; background, guidance, and plain-English fact sheets; and implementation strategy updates and schedules.

PLAIN ENGLISH GUIDANCE MATERIALS

The Federal SBAP prepares materials for use by the states to explain new EPA CAA rules in plain English. These include detailed guidebooks with options for compliance, including pollution prevention; sample reporting and recordkeeping forms; and example calculations. These are distributed to state SBAPs in hard copy and electronic format so that states could customize the guidebooks and reproduce as many as needed.

- Halogenated Solvent Cleaning (completed May 1995).
- Chromium Electroplating and Anodizing (completed May 1995).
- Wood Furniture (expected to be completed summer 1997).

Work has started on guidance for Potential-To-Emit (PTE), including a diskette-based application to assist businesses with PTE calculations for their particular industry.

SATELLITE SEMINARS

The Federal SBAP is working with EPA's Small Business Ombudsman (SBO) and OAQPS's Education and Outreach Group to present a series of satellite downlink seminars to educate small businesses on new EPA air regulations. These seminars include:

- Perc Drycleaners (May 1994) had 3,000 participants at 197 sites in 48 states, one Canadian site, and two in Mexico.
- Halogenated Solvent Cleaning/Degreasing (May 1995) had 1,300 participants at 101 sites in 45 states, one site in Canada, and two in Mexico.
- Chromium Electroplating (November 1995) had 2,000 participants at 140 sites in 43 states.
- Green and Profitable Printing (May 1996) was presented in cooperation with EPA's Office of Compliance through the Printer's National Environmental Assistance Center.
- Wood Furniture Manufacturing (September 1996) had approximately 1,900 participants at 140 sites in 34 states.
- Consumer Products expected to be broadcast in early 1998.

ANNUAL CONFERENCE

EPA holds an annual SBO/SBAP Conference, which is co-sponsored by OAQPS's Federal SBAP and the EPA SBO, with participation by the Office of Compliance and the Pollution Prevention Division. The majority of conference planning and presentations are carried out by the states. The 1996 meeting was held in San Diego, CA, with 150 attendees from 44 states and 2 territories. Several small business trade associations also participated. The purpose of this meeting is to:

- Facilitate implementation and operation of small business assistance programs.
- Interpret regulatory and policy developments affecting small businesses.
- Share EPA activities and programs to assist state SBAPs.

OTHER PARTNERSHIP ACTIVITIES

The Federal SBAP is working with staff from EPA's Office of Compliance and Pollution Prevention Division to determine a strategy to encourage all of the various small business assistance providers (i.e., SBAPs, Small Business Development Centers, pollution prevention programs, Manufacturing Extension Programs, etc.) to coordinate efforts within their state. This would provide small businesses with easier access to comprehensive business and environmental assistance.

APPENDIX D

SBTCP STATUS, BUDGETS, STAFFING AND ORGANIZATION

**TABLE D-1
STATE SMALL BUSINESS ASSISTANCE PROGRAMS
KEY CONTACT LISTING
December 1997**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
ALABAMA	Blake Roper, Ombudsman Administrative Division Department of Environmental Management P.O. Box 301463 Montgomery, AL 36130-1463 334-213-4308 334-213-4399 800-533-2336 (national)	James Moore Air Division Department of Environmental Management P.O. Box 301463 Montgomery, AL 36130-1463 334-271-7861 334-271-7950 (F) 800-533-2336 (national)	Mike Sherman Air Division Department of Environmental Management P.O. Box 301463 Montgomery, AL 36130-1463 334-271-7861 334-271-7950 (F) 800-533-2336 (national)
ALASKA	David Wigglesworth Small Business Advocate AK DEC 555 Cordova Street Anchorage, AK 99501 907-269-7582 907-269-7600 (F) 800-510-2332 (state)	Scott Lytle Small Business Assistance AK DEC 555 Cordova Street Anchorage, AK 99501 907-269-7571 907-269-7600 (F) 800-510-2332 (state)	
ARIZONA	Dual role SBO and SBAP	Gregory Workman AZ DEQ - Compliance Assistance 3033 N. Central Avenue Phoenix, AZ 85012 602-207-4337 602-207-4872 (F) 800-234-5677 (state)	Mary Bezaniuk AZ DEQ - Complinance Assistance 3033 N. Central Avenue Phoenix, AZ 85001 602-207-4871 602-207-4872 (F) 800-234-5677 x4871 (state)
ARIZONA - Maricopa County		Richard Polito Maricopa County SBEAP 1001 N. Central, Suite 200 Phoenix, AZ 85004 602-506-5102 602-506-6669 (F)	
ARKANSAS	Robert Graham Department of Pollution Control & Ecology P.O. Box 8913 Little Rock, AR 72219-8913 501-682-0708 501-682-0707 (F)		

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
CALIFORNIA	James Schoning Small Business Ombudsman California EPA Air Resources Board 2020 L Street P.O. Box 2815 Sacramento, CA 95814 916-323-6791 916-323-2393 (F) 800-272-4572 (state)	Peter Venturini California EPA Air Resources Board Stationary Source 2020 L Street P.O. Box 2815 Sacramento, CA 95814 916-445-0650 916-327-7212 (F)	Jon Pederson California EPA CARB-Office of Sm. Business Ombudsman 2020 L Street P.O. Box 2815 Sacramento, CA 95814 916-322-2825 916-323-2393 (F)
CALIFORNIA - South Coast	La Ronda Bowen Public Advisor South Coast Air Management District Small Business Assistance Office 21865 E. Copley Drive Diamond Bar, CA 91765 909-396-3235 909-396-3638 (F) 800-388-2121 (national)	Natalia Porche SCAQMD/SBAP 21865 E. Copley Drive Diamond Bar, CA 91765 909-396-3218 909-396-3335 (F) 800-388-2121 (national)	
COLORADO	Cathy Heald Department of Public Health & Environment Office of Customer Service 4300 Cherry Creek Drive, South Denver, CO 80246 303-692-2034 303-691-1979 (F)	Nick Melliadis Air Pollution Control Division Department of Health 4300 Cherry Creek Drive, South Denver, CO 80246 303-692-3175 303-782-5493 (F) 800-333-7798 (national)	Doug Ryder Air Pollution Control Division Department of Health 4300 Cherry Creek Drive, South Denver, CO 80246 303-692-3175 303-782-5493 (F) 800-333-7798 (national)
CONNECTICUT	Tracy Babbidge, Ombudsman Small Business Assistance Program Department of Environmental Protection 79 Elm Street Hartford, CT 06106-5127 860-424-3382 860-424-4063 (F) 800-760-7036 (state)	Glen Daraskevich Small Business Assistance Department of Environmental Protection Environmental Quality Division 79 Elm Street Hartford, CT 06106-5127 860-424-3545 860-424-4063 (F) 800-760-7036 (state)	Kirsten Cohen Small Business Assistance Department of Environmental Protection 79 Elm Street Hartford, CT 06106-5127 860-424-3548 860-424-4063 (F) 800-760-7036 (state)

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
DELAWARE	George Petitgout Small Business Ombudsman DE DNRC P.O. Box 1401 Dover, DE 19903 302-739-6400 302-739-6242 (F) 800-789-4599 (state)		Bob Barrish DE NREC 715 Grantham Lane New Castle, DE 19720 302-323-4542 302-323-4561 (F)
DISTRICT OF COLUMBIA	Carol Baker ERA/ARMD 2100 Martin Luther King Avenue, SE Washington, DC 20020 202-645-6093 x3082 202-645-6102 (F)	Olivia Achuko ERA/ARMD 2100 Martin Luther King Avenue, SE Washington, DC 20020 202-645-6093 x3071 202-645-6102 (F)	
FLORIDA	Elsa Bishop Small Business Ombudsman Department of Environmental Protection 2600 Blair Stone Road Tallahassee, FL 32399-2400 904-488-0114 904-922-6979 (F) 800-722-7457 (state)	Currently dual role as SBAP Principal and Small Business Ombudsman	Lorraine Clark FL SBAP - MS5505 Department of Environmental Protection 2600 Blair Stone Road Tallahassee, FL 32399-2400 904-488-1344 904-922-6979 (F) 800-722-7457 (state)
GEORGIA	Marvin Lowry GA SBAP 4244 International Parkway, Suite 120 Atlanta, GA 30354 404-363-7014 404-363-7100 (F)	Anita Dorsey-Word GA SBAP 4244 International Parkway, Suite 136 Atlanta, GA 30354 404-362-4842 404-363-7100 (F)	Ron Mathier GA SBAP 4244 International Parkway, Suite 120 Atlanta, GA 30354 404-363-7016 404-363-7100 (F)
HAWAII		Robert Tam HI Department of Health Clean Air Branch 919 Ala Moana Boulevard Honolulu, HI 96814 808-586-4200 808-586-4359 (F)	Willie Nagamine HI Department of Health Clean Air Branch P.O. Box 3378 Honolulu, HI 96801 808-586-4200 808-586-4359 (F)

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
IDAHO	Doug McRoberts ID DEQ/PL&E Statehouse Mail 1410 North Hilton Boise, ID 83706 208-373-0497 208-373-0169 (F)		Avijit Ray ID DEQ/PL&E Statehouse Mail 1410 North Hilton Boise, ID 83706 208-373-0298 208-373-0417 (F)
ILLINOIS	Donald Squires Illinois EPA/DAPC Small Business Ombudsman 2200 Churchill Road P.O. Box 19276 Springfield, IL 62794-9276 217-785-1625 217-782-9039 (F) 800-372-1996 (state)	Mark Enstrom Illinois Department of Commerce and Community Affairs 520 East Adams Springfield, IL 62701 217-524-0169 217-785-6328 (F) 800-252-3998 (state)	John Kelley Illinois EPA J.R. Thompson Center 100 West Randolph, Suite 11-300 Chicago, IL 60601 312-814-6026 312-814-1825 (F)
INDIANA	Maggie McShane IDEM/OBR 100 N. Senate P.O. Box 6015 Indianapolis, IN 46206-6015 317-232-8598 317-233-6647 (F) 800-451-6027 (state)	Cheri Storms IDEM/OPP & TA/VOC 100 N. Senate, Room 1320 P.O. Box 6015 Indianapolis, IN 46206-6015 317-233-1041 317-233-5627 (F)	
IOWA	Linda King IA Department of Development Small Business Liaison 200 E. Grand Street Des Moines, IA 50309 515-242-4761 515-242-4749 (F) 800-358-5510 (state)	John Konefes IA Waste Reduction Center University of Northern Iowa 75 Biology Research Complex Cedar Falls, IA 50614-0185 319-273-2079 319-273-2926 (F) 800-422-3109 (state)	Chris Klemesrud Iowa Department of Natural Resources Air Quality Bureau 7900 Hickman Avenue, Suite 1 Urbandale, IA 50322 515-281-6318 515-242-5094 (F)
KANSAS	Janet Neff Environmental Ombudsman Office of Pollution Prevention KS DH&E Forbes Field, Building 283 Topeka, KS 66620 913-296-0669 913-291-3266 (F) 800-357-6087 (national)	Frank Orzulak, Director Continuing Education Building University of Kansas Lawrence, KS 66045 913-864-3978 913-864-5827 (F) 800-578-8898 (state)	Theresa Hodges Pollution Prevention Director KS DH&E Forbes Field, Building 283 Topeka, KS 66620 913-296-6603 913-291-3266 (F)

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
KENTUCKY	Rose Marie Wilmoth Air Quality Representative Office of Commissioner Department of Environmental Protection 14 Reilly Road Frankfort, KY 40601 502-564-2150, x128 502-564-4245 (F) 800-926-8111 (national)	Gregg C. Copley, Director Kentucky Business Environmental Assistance Program Gatton College of Business and Economics University of Kentucky Lexington, KY 40506-0034 606-257-1131 606-323-1907 (F) 800-562-2327 (national)	Monica Hale-Kehrt Division of Air Quality KY DNR&EP 803 Schenkel Lane Frankfort, KY 40601 502-573-3382 502-573-3787 (F)
LOUISIANA	Jim Friloux, Small Business Ombudsman LA DEQ P.O. Box 82263 Baton Rouge, LA 70804 504-765-0735 504-765-0746 (F) 800-259-2890 (state)	Vic Tompkins LA Department of Environmental Quality (Air) 7290 Bluebonnet P.O. Box 82135 Baton Rouge, LA 70884-2135 504-765-2453 504-765-0921 (F) 800-259-2890 (state)	Liz Santa DEQ/AQD P.O. Box 82135 Baton Rouge, LA 70884-2135 504-765-0169 504-765-0222 (F) 800-259-2890 (state)
MAINE	Ron Dyer Department of Environmental Protection Office of Innovation and Assistance Station 17 State House Augusta, ME 04333 207-287-4152 207-287-2814 (F) 800-789-9802 (state)	Brian Kavanah Department of Environmental Protection Office of Innovation and Assistance Station 17 State House Augusta, ME 04333 207-287-6188 207-287-2814 (F) 800-789-9802 (state)	Jim Brooks Department of Environmental Protection Bureau of Air Quality Station 17 State House Augusta, ME 04333 207-287-2437 207-287-7641 (F)
MARYLAND	John Mitchell MD Department of the Environment Office of Community Assistance 2500 Broening Highway Baltimore, MD 21224 410-631-3003 410-631-3936 (F) 800-633-6101, x3003 (state)		Leslie Sipes Environmental Permits Service Center MD Department of the Environment 2500 Broening Highway Baltimore, MD 21224 410-631-3165 410-631-3896 (F) 800-433-1247 (national)
MASSACHUSETTS		George Frantz Executive Office of Environmental Affairs Office of Technical Assistance/#2109 100 Cambridge Street Boston, MA 02202 617-727-3260 x631 617-727-3827 (F)	

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
MICHIGAN	Dana Cole MI Jobs Commission Victor Center, 4th Floor 201 N. Washington Lansing, MI 48913 517-335-1847 517-335-0198 (F)	Dave Fiedler MDEQ Environmental Assistance Division P.O. Box 30457 Lansing, MI 48909 517-373-0607 517-335-4729 (F) 800-662-9278 (national)	
MINNESOTA	Charlie Kennedy MPCA/OEA 520 Lafayette Road St. Paul, MN 55155-4194 612-297-8615 612-297-8324 (F) 800-985-4247 (state)	Troy Johnson SBAP Coordinator Air Quality Division MN Pollution Control Agency 520 Lafayette Road St. Paul, MN 55155 612-296-7767 612-297-7709 (F) 800-657-3938 (state)	
MISSISSIPPI	Jesse Thompson Small Business Ombudsman MS DEQ P.O. Box 10385 Jackson, MS 39289-0385 601-961-5171 601-961-5742 (F) 800-725-6112 (national)		
MISSOURI	Brad Ketcher State of Missouri Office of the Governor P.O. Box 720 Jefferson City, MO 65102 573-751-3222 573-751-1495 (F)	Byron Shaw, Jr. DNR Technical Assistance Program Jefferson State Office Building Box 176 Jefferson City, MO 65102 573-526-5352 573-526-5808 (F) 800-361-4827 (national)	
MONTANA	Mark Lambrecht Department of Environmental Quality Small Business Ombudsman 1520 E. 6th Avenue Helena, MT 59620 406-444-2960 406-444-6836 (F) 800-433-8773 (national)	Adel Johnson Department of Environmental Quality Air Quality Division 1520 E. 6th Avenue Helena, MT 59620 406-444-4194 406-444-5275 (F) 800-433-8773 (national)	

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
NEBRASKA	Dan Eddinger Public Advocate Department of Environmental Quality P.O. Box 98922 Lincoln, NE 68509-8922 402-471-3413 402-471-2909 (F)	Dan Eddinger Dual Role as Ombudsman and SBAP Principal	
NEVADA	Marcia Manley Small Business Ombudsman NV Department of Environmental Protection 333 West Nyle Lane Carson City, NV 89710 702-687-4670, x3162 702-687-5856 (F) 800-992-0900, x4670 (state)	David Cowperthwaite Small Business Program Manager NV Department of Environmental Protection 333 West Nyle Lane Carson City, NV 89710 702-687-4670, x3118 702-687-5856 (F) 800-992-0900, x4670 (state)	Kevin Dick UNR/NV SBDC Business Environmental Program College of Business Administration-032 Reno, NV 89505-9975 702-784-1717 702-784-4237 (F)
NEW HAMPSHIRE	Rudolph Cartier Dual Role as Ombudsman and SBAP Principal	Rudolph Cartier Air Resources Division Department of Environmental Services 64 North Main Street, 2nd Floor Concord, NH 03301-2033 603-271-1379 603-271-1381 (F) 800-837-0656 (state)	
NEW JERSEY	John Serkies Office of Business Advocacy Department of Commerce and Economic Development 20 West State Street CN 823 Trenton, NJ 08625-0823 609-633-7308 609-777-3106 (F) 800-643-6090 (national)	Chuck McCarty Pollution Prevention-Permit Coordinator SBAP NJ DEPE P.O. Box 423 Trenton, NJ 08625-0423 609-292-3600 609-777-1330 (F)	Jeanne Mroczko Pollution Prevention-Permit Coordinator SBAP NJ DEPE P.O. Box 423 Trenton, NJ 08625-0423 609-292-3600 609-777-1330 (F)
NEW MEXICO	Robert Horwitz NM ED/AQB Harold Runnels Building P.O. Box 26110 Santa Fe, NM 87502 505-827-9685 505-827-0045 (F) 800-810-7227 (national)	Cecilia Williams NM ED/AQB Harold Runnels Building P.O. Box 26110 Santa Fe, NM 87502 505-827-0042 505-827-0045 (F) 800-810-7227 (national)	John Libretori City of Albuquerque EHD/APCD P.O. Box 1293 Albuquerque, NM 87103 505-768-1964 505-768-2617 (F)

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
NEW YORK	Tria Case Supervisor, Division of Small Business Environmental Ombudsman Unit Empire State Development, 32nd Floor 633 3rd Avenue New York, NY 10017 212-803-2282 212-803-2309 (F) 800-782-8369, x157 (national)	Marian Mudar Environmental Program Manager NYS Environmental Facilities Corporation 50 Wolf Road, Room 598 Albany, NY 12205 518-457-9135 518-485-8494 (F) 800-780-7227 (state only)	Patrick Lentile Bureau of Technical Support NYS Dept. of Environmental Conservation Division of Air Resources 50 Wolf Road, Room 110 Albany, NY 12233 518-457-7450 518-457-0794 (F)
NORTH CAROLINA	Edyth McKinney Office of the Small Business Ombudsman Department of Environment, Health, and Natural Resources P.O. Box 29583 Raleigh, NC 27626 919-733-1267 919-715-6794 (F) 800-829-4841 (national)	Fin Johnson Office of Small Business Ombudsman Department of Environment, Health and Natural Resources P.O. Box 29583 Raleigh, NC 27626 919-733-0824 919-715-6794 (F) 800-829-4841 (national)	Karen Davis Office of the Small Business Ombudsman Department of Environment, Health, and Natural Resources P.O. Box 29583 Raleigh, NC 27604 919-733-1267 919-715-6794 (F) 800-829-4841 (national)
NORTH DAKOTA	Jeff Burgess ND SDH&CL P.O. Box 5520 Bismark, ND 58506 701-328-5153 701-328-5200 (F) 800-755-1625 (state)	Tom Bachman ND SDH&CL Division of Environmental Engineering P.O. Box 5520 Bismark, ND 58506 701-328-5188 701-328-5200 (F) 800-755-1625 (state)	Dana Mount ND SDH&CL Division of Environmental Engineering P.O. Box 5520 Bismark, ND 58506 701-328-5188 701-328-5200 (F) 800-755-1625 (state)
OHIO	Mark Shanahan Clean Air Resource Center 50 West Broad Street, Room 1901 Columbus, OH 43215-5985 614-728-3540 614-752-9188 (F) 800-225-5051 (state)	Rick Carleski Ohio EPA Division of Air Pollution 1600 Watermark Drive Columbus, OH 43215 614-728-1742 614-644-3681 (F)	Bob Hodanbosi OEPA/DAPC P.O. Box 1049 1600 Watermark Drive Columbus, OH 43215 614-644-2270 614-644-3681 (F)
OKLAHOMA	Steve Thompson Deputy Executive Director Department of Environmental Quality 1000 NE 10th Street Oklahoma City, OK 73117-1212 405-271-8056 405-271-8425 (F)	Alwin Ning Small Business Program Department of Environmental Quality 1000 NE 10th Street Oklahoma City, OK 73117-1212 405-271-1400 405-271-1317 (F)	Kyle Arthur Small Business Program Department of Environmental Quality 1000 NE 10th Street Oklahoma City, OK 73117-1212 405-271-1400 405-271-1317 (F)

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
OREGON	Paul Burnet OR DEQ 811 SW 6th Avenue Portland, OR 97204-1390 503-229-5776 503-229-6945 (F) 800-452-4011 (state)	Terry Obteshka OR DEQ Air Quality Division 811 SW 6th Avenue Portland, OR 97204 503-229-6147 503-229-5675 (F) 800-452-4011 (state)	
PENNSYLVANIA*	Greg Czarnecki Office of P2 & Compliance Assistance PA DEP RCSOB, 13th Floor P.O. Box 8772 Harrisburg, PA 17105-8468 717-772-8951 717-783-2703 (F)	Scott Kepner Bureau of Air Quality PA DEP P.O. Box 8468 Harrisburg, PA 17105-8468 717-787-1663 717-772-2303 (F)	Cecily Beall PRC Environmental Management, Inc. 1800 JFK Boulevard, 6th Floor Philadelphia, PA 19103 215-656-8709 215-972-0484 (F) 800-722-4343 (national)
PUERTO RICO		Maria Rivera PREQB - SBAP IIC - 91, Box 9197 Vega Alta, PR 00692-9607 787-767-8025, x296 787-756-5906 (F)	
RHODE ISLAND	Roger Greene RI Department of Environmental Management 235 Promenade Street Providence, RI 02908 401-277-2771 401-277-4546 (F)	Richard Enander, Technical Asst. Mgr. RI Department of Environmental Management 235 Promenade Street Providence, RI 02908 401-277-6822, x4411 401-277-3810 (F) 800-253-2674 (state)	Richard Girasole RI Department of Environmental Management Technical/Customer Assistance 235 Promenade Street Providence, RI 02908 401-277-6822, x4411 401-277-3810 (F) 800-253-2674 (state)
SOUTH CAROLINA	Donna H. Gulledge, SBO SC Department of Health & Environmental Control 2600 Bull Street Columbia, SC 29201 803-734-5909 803-734-9196 (F) 800-819-9001 (national)	Willie Morgan Bureau of Air Quality Control Department of Health & Environmental Control 2600 Bull Street Columbia, SC 29201 803-734-5179 803-734-9196 (F) 800-819-9001 (national)	

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
SOUTH DAKOTA	Joe D. Nadenicek Small Business Ombudsman Department of Environment & Natural Resources Joe Foss Building 523 East Capitol Pierre, SD 57501 605-773-3151 605-773-6035 (F) 800-438-3367 (state)	Bryan Gustafson Department of Environment & Natural Resources Joe Foss Building 523 East Capitol Pierre, SD 57501 605-773-3351 605-773-6035 (F)	
TENNESSEE	Ernest Blankenship TN Department of Environment & Conservation L&C Tower, 8th Floor 401 Church Street Nashville, TN 37243-1551 615-532-0731 615-532-0614 (F)	Linda Sadler Small Business Assistance Program L&C Annex, 8th Floor 401 Church Street Nashville, TN 37243-1551 615-532-0779 615-532-0614 (F) 800-734-3619 (national)	
TEXAS	Tamra Shae-Oatman Small Business Advocate TX NRCC P.O. Box 13087 Austin, TX 78711-3087 512-239-1062 512-239-1065 (F) 800-447-2827 (national)	Kerry Drake Manager, Technical Assistance Program TX NRCC P.O. Box 13087 Austin, TX 78711-3087 512-239-1112 512-239-1065 (F) 800-447-2827 (national)	
UTAH	Stephanie Bernkopf UT Department of Environmental Quality Office of the Small Business Ombudsman 168 North 1950 West Salt Lake City, UT 84114-4810 801-536-4479 801-536-4099 (F)	Frances Bernards UT Department of Environmental Quality Division of Air Quality P.O. Box 144820 Salt Lake City, UT 84114-4820 801-536-4056 801-536-4099 (F) 800-270-4440 (state)	Ron Reece, Environmental Engineer UT Department of Environmental Quality Division of Air Quality P.O. Box 144820 Salt Lake City, UT 84114-4820 801-536-4091 801-536-4099 (F)
VERMONT		Judy Mirro VT Environmental Assistance Division Laundry Building 103 South Main Street Waterbury, VT 05671 802-241-3745 802-241-3273 (F)	Kevin Bracey VT APCD/ANR Building 3 South 103 South Main Street Waterbury, VT 05671 802-241-3841 802-241-2590 (F)

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
VIRGINIA	John Daniel, Air Division Director VA Department of Environmental Quality P.O. Box 10009 Richmond, VA 23240 804-698-4311 804-698-4510 (F) 800-592-5482 (state)	Richard Rasmussen Manager, Small Business Assistance Program VA Department of Environmental Quality P.O. Box 10009 Richmond, VA 23240 804-698-4394 804-698-4510 (F) 800-592-5482 (state)	
VIRGIN ISLANDS	Dual role SBO/SBAP Principal.	Marylyn A. Stapleton VI Department of Planning & Natural Resources Division of Environmental Protection 8000 Nisky Center, Suite 231 Charlotte Amalie, St. Thomas, VI 00802 340-777-4577 340-774-5416 (F)	
WASHINGTON	Leighton Pratt Department of Ecology P.O. Box 47600 Olympia, WA 98504-7600 360-407-7018 360-407-6802 (F)	Bernard Brady WA Department of Ecology Air Quality Program P.O. Box 48600 Olympia, WA 98504-7600 360-407-6803 360-407-6802 (F)	Judy Schwieters WA Department of Ecology Air Quality Program P.O. Box 47600 Olympia, WA 98504-7600 360-407-6804 360-407-6802 (F)
WEST VIRGINIA	Kenneth Shaw Small Business Ombudsman WV Office of Air Quality 1558 Washington Street, SE Charleston, WV 25311 304-558-1218 304-558-1222 (F) 800-982-2474 (state)	Fred Durham WV Office of Air Quality 1558 Washington Street, SE Charleston, WV 25311 304-558-1217 304-558-1222 (F) 800-982-2474 (state)	Joe Ciccarello WV Development Office/SBDC 950 Kanawha Boulevard, Suite 200 Charleston, WV 25311 304-558-2960 304-558-0127 (F) 800-982-2474 (state)
WISCONSIN	Hampton Rothwell Small Business Ombudsman Department of Development WI SBAP, 9th Floor 123 West Washington Avenue Madison, WI 53703 608-267-0313 608-267-0436 (F) 800-435-7287 (national)	Pam Christenson Technical Assistance Director Department of Commerce WI SBAP, 9th Floor 123 West Washington Avenue Madison, WI 53707 608-267-9214 608-267-0436 (F) 800-435-7287 (national)	Cliff Fleener Department of Commerce WI SBAP, 9th Floor 123 West Washington Avenue Madison, WI 53707 608-264-6153 608-267-0436 (F) 800-435-7274 (national)

**TABLE D-1
(Continued)**

STATE	OMBUDSMAN	SBAP	OTHER SBAP
WYOMING	Dan Clark Department of Environmental Quality OA/Small Business Ombudsman 122 W. 25th Street Cheyenne, WY 82002 307-777-7388 307-777-3773 (F)	Charles Raffelson Department of Environmental Quality Division of Air Quality 122 W. 25th Street Cheyenne, WY 82002 307-777-7391 307-777-5616 (F)	Charles Collins Department of Environmental Quality Division of Air Quality 122 W. 25th Street Cheyenne, WY 82002 307-777-7391 307-777-5616 (F)

• Notes

PA SBO position vacant in 1996. Greg Czarnecki appointed in 1997.

TABLE D-2
DATES OF ESTABLISHMENT AND COMMENCEMENT OF SBTCP OPERATIONS

STATE OR TERRITORY	MONTH & YEAR OF ESTABLISHMENT			MONTH & YEAR OPERATIONS BEGAN		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Alabama	5/93	7/94	N/E*	5/93	7/94	N/O
Alaska	6/95	6/95	6/95	6/95	6/95	11/95
Arizona	1/93	1/93	1/93	1/93	3/94	N/O
Maricopa Cty	N/R	1/95	N/R	N/R	2/95	N/R
Pima Cty	N/R	1/93	N/R	N/R	1/93	N/R
Arkansas	11/93	11/93	6/95	11/93	11/93	6/95
California	10/92	before 1990	N/E	4/95	before 1990	N/O
SCAQMD	6/89*	6/89*	N/A	6/89	6/89	N/A
Colorado	7/92	7/92	7/92	9/92	9/92	4/94
Connecticut	4/93	4/93	12/94	4/93	4/93	12/94
Delaware	12/95	12/95	N/E	12/95	12/95	N/O
District of Columbia	12/93	1/94	12/96	9/95	1/94	N/O
Florida	11/92	11/92	1/95	11/92	11/92	1/95
Georgia	2/92	11/92	5/93	7/92	7/93	11/94
Hawaii	N/E	N/E	N/E	N/O	N/O	N/O
Idaho	10/93	4/94	5/94	10/93	4/94	5/94
Illinois	5/92	9/92	N/E*	5/92	11/94	N/O
Indiana	3/93	1/95	7/95	3/93	3/94	7/95
Iowa	10/94	10/92	N/E	10/94	10/92	N/O
Kansas	11/93	3/94	12/93	11/93	3/94	12/93

**TABLE D-2
(Continued)**

STATE OR TERRITORY	MONTH & YEAR OF ESTABLISHMENT			MONTH & YEAR OPERATIONS BEGAN		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Kentucky	6/92 (parttime) 2/95 (fulltime)	7/94	10/94	6/92 (parttime) 2/95 (fulltime)	10/94	3/95
Jefferson Cty	8/95	11/95	10/94	8/95	Always provided tech. asst. for sm. bus.	3/95
Louisiana	11/92	11/92	10/93	11/92	11/92	10/93
Maine	10/93	10/93	10/93	11/93	4/94	4/94
Maryland	4/94	4/94	N/E	4/94	4/94	N/O
Massachusetts	N/E	11/92*	N/E	N/O	9/93*	N/O
Michigan	10/95	9/94	9/94	10/95	9/94	9/94
Minnesota	4/92	4/92	4/92	6/93	8/93	9/93
Mississippi	7/93	7/93	7/93	7/93	7/93	7/93
Missouri	8/92	8/92	8/92	5/94	5/94	N/O*
Montana	12/93	12/93	1/94	12/93	12/93	3/94
Nebraska	9/92	11/92	7/93	9/92	11/92	7/93
Nevada	1/95	1/95*	12/95	3/95	1/95	1/96
New Hampshire	11/94	1/93	11/95	11/94	1/93	3/96
New Jersey	3/93	11/92	12/95	3/93	11/92	N/O*
New Mexico	10/92	10/92	10/94	9/94	1/93	11/95
New York	4/92	4/92	N/E	1/93	4/92	N/O
North Carolina	1/93	8/93	11/94	1/93	8/93	11/94

**TABLE D-2
(Continued)**

STATE OR TERRITORY	MONTH & YEAR OF ESTABLISHMENT			MONTH & YEAR OPERATIONS BEGAN		
	SBO	SBAP	CAP	SBO	SBAP	CAP
North Dakota	4/92	4/92	5/92	4/92	4/92	6/93
Ohio	10/94	10/94	10/94	12/94	4/95	1/96
Oklahoma	6/94	6/94	6/96	10/94	10/94	6/96
Oregon	8/91	8/91	1/94	1/92	11/91	11/94
Pennsylvania	11/92	11/92	11/92	5/93	1/94	4/93
Puerto Rico	1/95*	11/94	1/96	1/95*	11/94	3/96
Rhode Island	5/95	11/96*	N/E	5/95	11/95	N/O
South Carolina	8/93	8/93	8/94	8/93	8/93	8/94
South Dakota	11/93	11/92	4/94	11/93	11/92	4/94
Tennessee	1/93	1/93	1/93	3/93	11/93	N/O
Texas	2/92	1/92	11/92	2/92	1/92	11/92
Utah	1/94	1/94	1/94	5/94	1/93	6/95
Vermont	N/E	12/96	N/E	N/O	12/96	N/O
Virginia	8/92	3/93	11/95	4/93	7/93	11/95
US Virgin Islands	1/93	1/93	N/E	1/93	1/93	N/O
Washington	Fall 92	Summer 93	Summer 93	Fall 92	Summer 93	Summer 93
West Virginia	4/94	11/93	1/95	12/94	5/94	3/95
Wisconsin	4/92	4/92	4/92	11/92	12/92	8/94
Wyoming	3/92	3/92	3/92	5/94	11/93	5/95

**TABLE D-2
(Continued)**

N/E Not established
N/O Not operational
N/R No response

***Notes:**

AL Not yet fully appointed.

CA SCAQMD SBO and SBAP combined.

IL 3 members appointed to date. No CAP meeting yet held.

MA 11/92 SBAP date of establishment is date of MA SIP revision.
 9/93 SBAP date of commencement of operations: although 507 SBAP did not formally begin until this time, multimedia technical assistance to small business had been occurring for some time through OTA and some outreach elements at DEP. While the structure of the Massachusetts program does not exactly mirror Section 507 program design, services have been provided on a free and confidential basis by OTA as part of the Commonwealth's Toxics Use Reduction program. Business leaders (large and small) are invited to meet every month with Trudy Coxe, Secretary of Environmental Affairs, the concerns are communicated to OTA and DEP staff for appropriate response.

MO Only 2 members have been appointed as of January 1997.

NJ Became operational 1/97 (following this reporting period).

NV Manager of SBAP was established 1/95. However, a staff person who has been designated as SBAP Coordinator was not hired until November 1996.

PR SBO resigned 1/96. No SBO assistance provided 1996.

RI One FTE hired to staff SBAP 11/96. Up to that point, the Department's existing Pollution Prevention Program staff had been responding to industry inquiries.

**TABLE D-3
1996 SBTCP BUDGET INFORMATION AND FUNDING SOURCES**

STATE OR TERRITORY	BUDGET (\$)			SOURCE OF FUNDING		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Alabama	150,000-165,000	Function performed as part of overall permitting program. No specific budget designated.	N/R	Federal air grant funds, Title V fees, surface water grant funds, state solid waste funds, Federal RCRA grant funds	Title V fees/permit fees	N/R
Alaska	112,700 combined FY97 (7/96-6/97)	Combined	Combined	Interagency receipts: Funds provided from combination of state general funds and air permitting fees transferred to SBTCP	Same	Same
Arizona	165,000 combined	Combined	Combined	Air Quality Permit fees (combined)	Same	Same
Maricopa County	N/R	140,000	N/R	N/R	General permit fees	N/R
Pima County	N/R	30,000	N/R	N/R	Title V and general fund	N/R
Arkansas	80,000	100,000	3,500	EPA allocation and Title V fees	EPA allocation and Title V fees	EPA allocation and Title V fees
California	200,000	340,000	0	State Budget Act	State Budget Act	State Budget Act
SCAQMD	887,659	SBO/SBAP combined	N/A *	29% from emissions fees (~\$225,000), 45% from permit fees (~\$400,000), 25% from annual operating fees (~\$220,000), 1% from subvention funds (~\$8,000)	SBO/SBAP combined	N/R

**TABLE D-3
(Continued)**

STATE OR TERRITORY	BUDGET (\$)			SOURCE OF FUNDING		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Colorado	90,000	120,000	0	CO Dept. of Public Health and Env./CDPHE, Air Pollution Control Div., stationary sources (permitting and annual fees)	Same	0
Connecticut	325,000 (combined)	Combined	Combined	State fund that supports Clean Air Act-vehicle registration fees, Title V fees for costs related to Title V permitting activities	Same	Same
Delaware	80,000	Combined	Combined	Title V fees	Title V fees	Title V fees
District of Columbia	5,000 (salary)	8,000 (salary)	N/R	Air grant	Title V fees	N/R
Florida	Funded under SBAP	158,000	Funded under SBAP	Title V fees	Title V fees	Title V fees
Georgia	65,000	115,000	10,000	Title V fees	Title V fees	Title V fees
Hawaii	N/R	N/R	N/R	Title V fees	Title V fees	Title V fees
Idaho	65,000	30,000	5,000	Title V fees	Title V fees, 105 funding	Title V fees
Illinois	75,000	255,000	0	Title V fees	Title V fees	N/A
Indiana	150,000	700,000	3,000	General revenues/Title V fees	General revenues/Title V fees/enforcement fines	Legislative Service Agency
Iowa	74,500 plus 10,000 for special project	310,000	N/A	Title V fees	Department of Natural Resources	N/A

**TABLE D-3
(Continued)**

STATE OR TERRITORY	BUDGET (\$)			SOURCE OF FUNDING		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Kansas	125,000	340,000	No budget, travel expenses only	Air fee funds	Air fee funds	N/R
Kentucky	107,000	250,000	2,000	Title V fees	Title V fees	Title V fees
Jefferson County	50,000	80,000	2,000	EPA 105 Grant and general funds	EPA 105 Grant and general funds	N/R
Louisiana	N/R	400,000	0	Operating budget of existing programs	240,000 = 105 grant 160,000 = self-generated	N/A
Maine	40,000	75,000	As needed (negligible)	Toxic Use Reduction Program fees	Title V fees	Toxic Use Reduction Program fees
Maryland	0	61,000	N/A	N/A	Maryland Department of the Environment funds	N/A
Massachusetts	N/A	51,000	N/A	N/A	Toxics Use Reduction Act program	N/A
Michigan	100,000 (FY 95-96)	470,000 (FY 95-96)	0	State & county fees, restricted funds	State & county fees, restricted funds	Unfunded
Minnesota	71,000 (FY97)	316,000 (FY97)	1,000 (FY97)	Air fees, 105 grant	Air fees, 105 grant, Leadership grant	Air fees, 105 grant
Mississippi	150,000	150,000	5,000	Title V fees	Title V fees	Title V fees
Missouri	50,000	415,000	12,000	Title V fees and other fees	Title V fees and general revenue	Title V fees
Montana	130,000	Combined w/SBO	1,000	Air Quality Permit fees	Same	Same
Nebraska	106,000 (combined)	N/R	N/R	Title V fees	Same	N/R

**TABLE D-3
(Continued)**

STATE OR TERRITORY	BUDGET (\$)			SOURCE OF FUNDING		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Nevada	52,500*	52,500*	3,000*	Indirect cost pool	Indirect cost pool	Air Quality Management fund*
New Hampshire	25,000	75,000	Included in SBAP	Emission fees	Emission fees	N/R
New Jersey	80,000	80,000	1,500	Title V fees	Title V fees & 105 Air Grant	Title V fees
New Mexico	10,000	205,000	<1,000	Title V fees, other state funds	Title V fees, other state funds, grants	Title V fees, other state funds
New York	1,170,000	1,000,000	N/R	NY Clean Air Fund/Title V fees	Same	N/R
North Carolina	324,000 (SBO & SBAP combined)	SBO & SBAP combined	5,000	Title V fees	Title V fees	Title V fees
North Dakota	30,000	30,000	1,000	Title V fees	Title V fees	Title V fees
Ohio	175,000	323,000	Combined w/SBAP	Title V fees, OAQDA funds	Title V fees	Title V fees
Oklahoma	10,000	120,000	Combined w/SBAP	Agency indirect costs	Title V fees, EPA Leadership grant	N/A
Oregon	31,756	86,430	2,120	Title V fees	Title V fees	Title V fees
Pennsylvania	185,000 (41,000 actual)*	460,000	10,000	Title V fees	Title V fees	Title V fees
Puerto Rico	0	228,000	0	Title V fees	Title V fees	Title V fees
Rhode Island	70,000	90,000	0	State Hard-to-dispose material account	Title V fees	N/A
South Carolina	35,000	85,000	1,500	Title V fees	Title V fees	Title V fees
South Dakota	25,000	10,000	5,000	Title V fees	Title V fees	Title V fees
Tennessee	900,000 (SBO & SBAP)	Combined w/SBO	Combined w/SBO	Title V fees	Title V fees	Title V fees

**TABLE D-3
(Continued)**

STATE OR TERRITORY	BUDGET (\$)			SOURCE OF FUNDING		
	SBO	SBAP	CAP	SBO	SBAP	CAP
Texas	1,260,000 (combined and for fiscal year)	Combined	Combined	1,191,648 = 151 funds 68,352 = 102 grant funds	Same	Same
Utah	85,000	210,000	5,000	Title V fees, Utah "Air Fair" grant, EPA "Partnership for Compliance" grant	Title V fees, EPA "Partnership for Compliance" grant	Title V fees
Vermont	Did not exist	Not budgeted for '96	Did not exist	N/R	State	N/R
Virginia	10,000	180,000	5,000	General funds	Federal trust, permit fees, and general fund (\$50,000 from EPA Leadership Grant)	General funds, permit fees
Virgin Islands	N/R	55,000	N/R	N/R	Title V fees	N/R
Washington	40,000	225,000	5,000	Title V fees	200,000 = Title V fees 25,000 = SBAP grant	Title V fees
West Virginia	55,000	100,000	5,000	Title V fees & Agency penalties	Title V fees & Agency penalties	Agency penalties (expense reimbursement only; actual yearly expenses less than 1,000)
Wisconsin	15,000	117,000	3,000	General purpose revenue	Program revenue (permit fees)	Program revenue (permit fees)
Wyoming	25,000	75,000	10,000	Title V fees	Title V fees	Title V fees

N/R No response
N/A Not applicable

**TABLE D-3
(Continued)**

***Notes:**

- CA** SCAQMD Governing Board recommended the creation of a Local Government and Small Business Assistance Committee, which will not be in effect until sometime in the 1997-98 fiscal year.
- NV** Funding for state program only. Clark County Health District, Air Quality Program and Washoe County Health Department, Air Quality Program do have people in their compliance and permitting branches respectively that provide assistance to small businesses. However, these programs are not formal ones. NDEP does not have access to information regarding expenditures from these two entities. Air Quality Management fund is funded through air quality permit fees.
- PA** SBO position has been vacant since 4/96. The SBO is being relocated from the Department of Community and Economic Development to the Department of Environmental Protection. There has not been a decrease in funding, but the funds have not been spent due to the vacancy.

EPA 105 grants are provided for in the CAAA, Section 105. Funding is distributed to the states through the EPA regional offices.

Leadership grants (Research and Development grants to the states) flow from EPA's Office of Research and Development through the Innovative Technology Control Program. Funding comes from the President's Environmental Technology Initiative (ETI).

TABLE D-4
COMPARISON OF 1995, 1996, AND 1997 BUDGETS
and
DESCRIPTIONS OF SIGNIFICANT FUNDING CHANGES

STATE OR TERRITORY	BUDGET FOR 1995 REPORTING PERIOD (1)				BUDGET FOR 1996 REPORTING PERIOD (2)				BUDGET FOR 1997 REPORTING PERIOD (3)			
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL
Alabama	150,000	50,000	N/R	200,000	150,000-165,000	Combined	N/R	150,000-165,000	166,000	164,000	N/R	330,000
Alaska	192,600 (combined; FY 96)	Combined	Combined	192,600	112,700 (combined; FY 97)	Combined	Combined	112,700	118,100 (combined; FY 98)	Combined	Combined	118,100
Arizona	165,000	Combined	Combined	165,000	165,000	Combined	Combined	165,000	165,000	Combined	Combined	165,000
Maricopa County	N/R	120,000	N/R	120,000	N/R	140,000	N/R	140,000	N/R	140,000	N/R	140,000
Pima County	N/R	90,000	N/R	90,000	N/R	30,000	N/R	30,000	N/R	30,000	N/R	30,000
Arkansas	75,000	90,000	2,000	167,000	80,000	100,000	3,500	183,500	85,000	100,000	3,000	188,000
California	200,000	340,000	0	540,000	200,000	340,000	0	540,000	200,000	340,000	5,000	545,000
SCAQMD	883,383 (FY 95-96)	SBO/SBAP combined	N/R	883,383	887,659 (FY 96-97)	SBO/SBAP combined	N/R	887,659	1,434,000 (FY 97-98)	SBO/SBAP combined	Combined	1,434,000
Colorado	80,000	120,000	0	210,000	80,000	120,000	0	210,000	80,000	120,000	0	210,000
Connecticut	325,000	Combined	Combined	325,000	325,000	Combined	Combined	325,000	325,000	Combined	Combined	325,000
Delaware	80,000 (combined)	Combined	N/A	80,000	80,000 (combined)	Combined	Combined	80,000	80,000 (combined)	Combined	Combined	80,000
District of Columbia	N/R	20,000	0	20,000	5,000	8,000	N/R	13,000	5,000	8,000	5,000	18,000
Florida	Combined	180,000	Combined	180,000	Combined	158,000	Combined	158,000	N/R	171,000	N/R	171,000
Georgia	65,000	100,000	7,000	162,000	65,000	115,000	100,000	190,000	65,000	115,000	10,000	190,000
Hawaii	Did not exist	Did not exist	Did not exist	0	N/R	N/R	N/R		N/R	N/R	N/R	
Idaho	65,000	30,000	5,000	100,000	65,000	30,000	5,000	100,000	65,000	30,000	5,000	100,000
Illinois	65,000	180,000	N/R	245,000	75,000	255,000	N/R	330,000	75,000	400,000	10,000	485,000
Indiana	150,000	700,000	3,000	853,000	150,000	700,000	3,000	853,000	150,000	700,000	3,000	853,000
Iowa	74,500	232,500	N/A	307,000	74,500 (+ 10,000 for special project)	310,000	N/A	394,500	84,500	310,000	N/A	394,500
Kansas	125,000	340,000	Travel only	465,000	125,000	340,000	Travel only	465,000	125,000	340,000	Travel only	465,000
Kentucky	10,000	250,000	400	260,400	90,000	250,000	2,000	342,000	107,000	250,000	2,000	359,000
Jefferson Cty	40,000	80,000	400	120,400	50,000	80,000	2,000	132,000	50,000	80,000	2,000	132,000

**TABLE D-4
(Continued)**

STATE OR TERRITORY	BUDGET FOR 1995 REPORTING PERIOD (1)				BUDGET FOR 1996 REPORTING PERIOD (2)				BUDGET FOR 1997 REPORTING PERIOD (3)			
	SSO	SSAP	CAP	TOTAL	SSO	SSAP	CAP	TOTAL	SSO	SSAP	CAP	TOTAL
Louisiana	50,000	No change	No change	Unknown	N/R	400,000	0	400,000	Unknown	400,000	0	Unknown
Maine	40,000	75,000	As needed	115,000	40,000	75,000	As needed	115,000	40,000	75,000	As needed	115,000
Maryland	0	200,000	N/A	200,000	0	61,000	N/A	61,000	0	61,000	0	61,000
Massachusetts	N/A	0*	N/A	0	N/A	61,000	N/A	61,000	N/A	?	N/A	Insuff.
Michigan	80,000 (FY94-95)	486,000 (FY94-95)	0	546,000	100,000 (FY96-98)	470,000 (FY96-98)	0	570,000	100,000 (FY96-97)	467,000 (FY96-97)	0	567,000
Minnesota	48,000 (FY98)	255,000 (FY98)	1,000 (FY98)	304,000	71,000 (FY97)	318,000 (FY97)	1,000 (FY97)	388,000	71,000 (FY98)	148,000 (FY98)	1,000 (FY98)	218,000
Mississippi	150,000	150,000	5,000	305,000	150,000	150,000	5,000	305,000	150,000	150,000	5,000	305,000
Missouri	45,000	290,000	10,000	345,000	50,000	415,000	12,000	477,000	N/R	N/R	N/R	N/R
Montana	130,000	Combined w/SSO	1,000	131,000	130,000	Combined w/SSO	1,000	131,000	130,000	Combined w/SSO	1,000	131,000
Nebraska	106,000	N/R	N/R	106,000	106,000	N/R	N/R	106,000	106,000	N/R	N/R	106,000
Nevada	52,500	52,500	3,000	108,000	52,500	52,500	3,000	108,000	52,500	52,500	3,000	108,000
New Hampshire	25,000	75,000	Combined w/SSAP	100,000	25,000	75,000	Combined w/SSAP	100,000	25,000	75,000	Combined w/SSAP	100,000
New Jersey	40,000	80,000	0	120,000	80,000	80,000	1,500	161,500	80,000	80,000	1,500	161,500
New Mexico	10,000	205,000	<1,000	216,000	10,000	205,000	<1,000	216,000	10,000	205,000	<1,000	216,000
New York	1,170,000	928,000	N/R	2,098,000	1,170,000	1,000,000	N/R	2,170,000	1,170,000	1,000,000	N/R	2,270,000
North Carolina	320,000 SSO & SSAP	SSO & SSAP combined	5,000	325,000	324,000 (SSO & SSAP combined)	SSO & SSAP combined	5,000	329,000	329,000 (SSO & SSAP combined)	SSO & SSAP combined	5,000	334,000
North Dakota	30,000	30,000	0	60,000	30,000	30,000	1,000	61,000	30,000	30,000	1,000	61,000
Ohio	185,000	185,000	0	380,000	175,000	323,000	N/R	498,000	225,000	400,000	N/R	625,000
Oklahoma	10,000	115,000	Combined w/SSAP	125,000	10,000	120,000	Combined w/SSAP	130,000	10,000	115,000	Combined w/SSAP	125,000
Oregon	30,963	173,675	1,500	206,138	31,758	86,430	2,120	120,308	32,550	88,590	2,175	123,315
Pennsylvania	185,000	460,000	10,000	655,000	185,000 (41,000 actual)	460,000	10,000	611,000	190,000	500,000	10,000	700,000
Puerto Rico	25,000	100,000	10,000	135,000	0	228,000	0	228,000	15,000	198,000	10,000	223,000
Rhode Island	64,838	42,258	0	107,186	70,000	90,000	0	160,000	75,000	143,000	0	218,000

**TABLE D-4
(Continued)**

STATE OR TERRITORY	BUDGET FOR 1995 REPORTING PERIOD (1)				BUDGET FOR 1996 REPORTING PERIOD (2)				BUDGET FOR 1997 REPORTING PERIOD (3)			
	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL	SBO	SBAP	CAP	TOTAL
South Carolina	35,000	85,000	1,500	121,500	35,000	85,000	1,500	121,500	35,000	85,000	1,500	121,500
South Dakota	25,000	10,000	5,000	40,000	25,000	10,000	5,000	40,000	25,000	10,000	5,000	40,000
Tennessee	900,000	Combined	Inactive	900,000	900,000	Combined	Combined	900,000	900,000	Combined	Combined	900,000
Texas	1,470,000 (SBO, SBAP, CAP combined; fiscal year)	Combined	Combined	1,470,000	1,280,000 (SBO, SBAP, CAP combined; fiscal year)	Combined	Combined	1,280,000	1,037,504	N/R	N/R	1,037,504
Utah	120,000	135,000	5,000	260,000	85,000	210,000	5,000	300,000	115,000	287,500	5,000	377,000
Vermont	Did not exist	Did not exist	Did not exist	0	Did not exist	Not budgeted	Did not exist	0	Unknown	50,000	Unknown	50,000
Virginia*	20,000	155,000	5,000	180,000	10,000	180,000	5,000	195,000	10,000	200,000	5,000	215,000
Virgin Islands	0	N/R	0	0	N/R	55,000	N/R	55,000	Unknown	65,000	5,000	70,000
Washington	40,000	225,000	5,000	270,000	40,000	225,000	5,000	270,000	40,000	200,000	5,000	245,000
West Virginia	50,000	70,000	5,000	125,000	55,000	100,000	5,000	160,000	80,000	150,000	5,000	215,000
Wisconsin	15,000	117,000	3,000	135,000	15,000	117,000	3,000	135,000	15,000	117,000	3,000	135,000
Wyoming	25,000	75,000	10,000	110,000	25,000	75,000	10,000	110,000	25,000	75,000	10,000	110,000

N/R No response
N/A Not applicable

***Notes:**

- MA** No separate budget existed, but actual expenditures were higher, due to more resources dedicated to the program (1.25 FTE in 1995 vs. 0.8 FTE in 1996).
- VA** 1995 budget amount of \$310,000 entered in last year's report was in error. Calendar year budget amounts are based on fiscal year budgets July 1 through June 30 for the previous year (i.e., calendar year 1995 = FY 1996 budget).

**TABLE D-4
(Continued)**

Significant changes (more than 10%) in the level of funding between the 1995, 1996, and 1997 annual budget periods are described below.

STATE	DESCRIPTION OF SIGNIFICANT BUDGET CHANGES
Alabama	The significant change indicated in the SBAP budget was due to a better estimation of the actual FTEs of effort expended doing small business assistance. The 1995 estimate was 1.0 FTE versus a 3.4 FTE estimate for the 1997 budget. The difference in the SBO budget was due simply to staff salary increases.
Alaska	SBTCP budget reduced 41 percent for FY97 due to reductions in anticipated program receipts (air permitting fees) due to delays in receiving Title V program approval.
Maricopa Cty	Increase was used to expand services, provide P2 guides, marketing, workshops, and home page enhancements to increase the number of businesses helped.
Pima Cty	County appropriations to the Business Assistance Program, including funds to cover assistance regarding hazardous materials and waste generated from a landfill tipping fee, were cut.
Arkansas	Operate with a Leadership Grant Award, Title V fees and two professional services contracts with Henderson State University and University of Arkansas.
California - SCAQMD	Small Business Assistance Office is being loaned an office assistant (during FY 96-97). This position will be transferred to the Small Business Office at the end of June 1997, resulting in an increase to the 1997-98 fiscal year budget. Also, \$50,000 is being added to the 1997-98 budget to increase business outreach.
Colorado	Effective June 30, 1997, the Small Business Ombudsman Office will no longer be located in the Office of Regulatory Reform. Senate Bill 96-1307 requires the function of the ombudsman to move to the Department of Public Health and Environment.
Connecticut	Program funding has remained constant at \$325,000. Resources have been reallocated to provide program support and expansion on specific program initiatives such as the grant project for metal finishing or outreach on Title V. While the level of funding has remained constant, existing available resources have been shifted within the Bureau of Air Management to provide additional program support as necessary.
District of Columbia	More responsibilities have been added to SBAP that drastically reduced her involvement with SBAP activities.
Georgia	The addition of a second engineer to the small business program resulted in an increase in the SBAP's budget.
Illinois	The budget has grown as the program jumped to 5 FTE. The funding source became CAAA Title V permit fees, and outreach activities have increased.
Iowa	Increased funding to add staff and equipment. Additional funding to hire a consultant to conduct an educational outreach study. Expect increased costs associated with implementation of this plan and designing a web page.
Louisiana	SBO-unknown, new administration. SBAP-no change. CAP-no change.

**TABLE D-4
(Continued)**

STATE	DESCRIPTION OF SIGNIFICANT BUDGET CHANGES
Maryland	For the first half of 1995, the SBAP was funded for three engineers and a dedicated secretary. As a result of Maryland Department of the Environment's reorganization, the program was reduced to one engineer and 15% of a secretary. Also, the scope of the program was changed from air-only assistance to multimedia assistance. The funding was moved from the Air and Radiation Management Administration to the indirect funds from the Office of the Secretary. The program is expected to remain the same for 1997.
Massachusetts	<p>In the 1995 SBAP Annual Report, we listed 1.75 FTEs for the SBTCP activity; this year, we have 0.8 FTE. The reduction is based on the need to devote resources to other specific projects, such as the Massachusetts Printers Partnership (MP2) and the Environmental Results Project (ERP). We have attempted to include in each of these projects the essential support for small business entities.</p> <p>MA Department of Environmental Protection reports that fewer than expected Title V permits were written, due in part to many companies filing for Restricted Emission Status (FESOP program). In addition, our programs have been multimedia since inception. As with some other states, there has been some reluctance to establish a single media program.</p>
Minnesota	Previous numbers (fiscal 95 and 96) may have not indicated indirect budget information. Increase in fiscal 96 and 97 due to EPA Leadership grant for 2-year wood finishing project (\$170,000).
Missouri	SBAP: Funding constraints were removed, which allowed two vacancies to be filled.
Nevada	No significant changes in budgets at SBAP level. However, some additions to the budget will be made to incorporate the salary for the newly hired Technical Assistance Coordinator.
North Carolina	During 1996, the Environmental Permit Information Center was started under the Small Business Ombudsman and funds were spent for office space, furniture, and equipment to open this office. This start up expense will not reoccur in 1997.
Ohio	SBAP hired one additional FTE in June 1996 and new budgets reflect one additional staff member. Both SBO and SBAP operated at lower than expected levels due to lower than expected revenues from Title V fees.
Oregon	During 1996, the SBAP was comprised of 1.35 FTE (one FTE less than 1995). The program is expected to continue with 1.35 FTE in 1997. This position was reassigned in the Air Quality Division and is involved with special educational projects. The \$86,430 annual budget reduction will be partially offset by an EPA grant awarded to Region X SBAPs. Oregon's share of the \$200,000 (\$150,000 Leadership + \$50,000 105 Grant) is \$25,000 for 1996 and 1997, \$50,000 total. This money is funding special projects through the Pacific Northwest Pollution Prevention Resource Center in Seattle, WA. No other staff additions and reductions of revenue are anticipated during the 1996 and 1997 budgetary cycles.
Pennsylvania	The SBO position has been vacant since 4/96. The SBO is being relocated from the Department of Community and Economic Development to the Department of Environmental Protection. There has not been a decrease in funding, but the funds have not been spent due to the vacancy.
Puerto Rico	Salaries have been raised to staff since June 1996.
Rhode Island	<p>SBO-More than 10% increase attributed to rounding budget to nearest \$5,000.</p> <p>SBAP-Increase due to hiring of a full-time Environmental Planner and a Principal Environmental Planner (to be hired; 75% of total annual budget) to coordinate SBAP functions. \$53,887 also included for University of Rhode Island Center for Pollution Prevention support work.</p>

**TABLE D-4
(Continued)**

STATE	DESCRIPTION OF SIGNIFICANT BUDGET CHANGES
Texas	Loss of 102 grant funds.
Utah	Voluntary Assistance Program position (courtesy inspector) transferred from SBO office to SBAP, which accounts for drop in SBO expenses in 1996 (as well as increase to SBAP budget). Also, EPA "Partnership for Compliance" funds of \$150,000 incorporated into budget: \$10,000 for FY95; \$43,500 for FY96; and \$96,500 for FY97.
Vermont	In December 1996, a full-time employee was hired as the Small Business Compliance Advisory Program Engineer. This marks the first time a full-time employee has been hired specifically to assist small businesses. The estimated budget for this position for 1997 is \$50,000. This also marks the first time that money has been allocated from the state to run this program.
Virginia	<p>There are several reasons for the decline in the budget for SBO/SBAP.</p> <p>1) SBAP budget declined from FY95 through FY97 primarily due to a leveling of costs to maintain the air programs as a result of EPA non-approval of Title V. Virginia's enabling legislation for Title V fees precluded DEQ from collecting those fees until EPA approved the Virginia Title V program. That approval is now imminent and we should be able to begin collecting fees beginning July 1, 1997. Once permitting resources are addressed, it may be possible to devote more resources to SBO/SBAP.</p> <p>2) Concurrently, there was a reduction of \$20,000 in federal 105 grant funds from FY95 to FY96, which could not be replaced by fees.</p> <p>3) FY94-96 biennium budget proved not to be an accurate reflection of the program expenses and resources. The budget was again restructured when the agency went to a unit budget concept for FY96-98 biennium budget and adjusted at the biennium midyear to more accurately reflect expenditures to budgeted revenues.</p>
West Virginia	The SBO significantly has increased participation in trade shows and professional organizational events. This has raised travel and display costs. The SBAP has substantially increased on-site visits and compliance audits. Also, have participated in more multimedia training workshops. Projected increase in 1997 due to dedicating more resources for developing general permits.

**TABLE D-5
STAFFING INFORMATION**

A summary of the number of full time equivalents (FTEs) that support the SBO function and SBAP function are shown in Table D-5. With respect to the SBAP, the number of paid and unpaid staff are shown separately. The utilization of retired engineers to serve the SBAP also is indicated.

STATE OR TERRITORY	SBO FUNCTION (NO. FTEs)		SBAP FUNCTION (NO. FTEs)			
	SBO	OTHER STAFF	ALL STAFF	PAID	UNPAID	RETIRED ENGINEERS
Alabama	3.0	N/R	3.4	3.4	N/R	0
Alaska	1.0	0.25	1.5	1.5	0	0
Arizona	0.25	N/R	2.25	2.25	0	0
Maricopa County	N/R	N/R	3.0	3.0	N/R	0
Pima County	N/R	N/R	1.0	1.0	N/R	0
Arkansas	1.0	5.0	6.0	6.0	0	3.0
California	5.0 +	3.0 +	20.0	20.0	N/R	0
SCAQMD	6.0	1.0	2.0	2.0	0	0
Colorado	1.5	N/R	2.0	2.0	0	0
Connecticut	3.0	0	1.0*	0	0	0
Delaware	1.0	0	1.0	0	0	0
District of Columbia	0.20	0	0.25	0.25	0	0
Florida	SBO/SBAP combined	N/R	4.0	4.0	0	0
Georgia	0.5	0.5	2.5	2.5	0	1.0
Hawaii	1.0	1.0	2.0	2.0	N/R	0
Idaho	1.0	N/R	1.0	1.0	0	0

**TABLE D-5
(Continued)**

STATE OR TERRITORY	SBO FUNCTION (NO. FTEs)		SBAP FUNCTION (NO. FTEs)			
	SBO	OTHER STAFF	ALL STAFF	PAID	UNPAID	RETIRED ENGINEERS
Illinois	1.5	0	5.0	5.0	0	0
Indiana	2.0	0.25	12.0	0	0	0
Iowa	1.0	0.5	5.0	5.0	0	0
Kansas	1.0	1.0	3.5	3.5	0	0
Kentucky	1.5	0	3.0	3.0	N/R	0
Jefferson County	1.0	0	2.0	2.0	0	0
Louisiana	0.25	0	11.0	11.0	0	0
Maine	1.0	0	1.0	1.0	0	0
Maryland	0.1	0	1.1	1.1	0	0
Massachusetts	N/A	N/A	0.8	0.8	N/A	N/A
Michigan	1.0	0	5.0	5.0	0	0
Minnesota	1.0	0	3.0	3.0	0	0
Mississippi	2.75	N/R	6.5	6.5	N/R	3.0
Missouri	1.0	0	8.0	8.0	0	0
Montana	1.0	N/R	1.0	N/A	N/A	N/A
Nebraska	1.0	0	1.0	N/A	N/R	N/A
Nevada	1.0	0	1.0	1.0	0	0
New Hampshire	0.25	N/R	0.75	0.75	0	N/A
New Jersey	1.0	0	1.0	1.0	0	0

**TABLE D-5
(Continued)**

STATE OR TERRITORY	SBO FUNCTION (NO. FTEs)		SBAP FUNCTION (NO. FTEs)			
	SBO	OTHER STAFF	ALL STAFF	PAID	UNPAID	RETIRED ENGINEERS
New Mexico	0.5	0	4.5	4.5	0	0
New York	4.0	1.0	7.0	7.0	0	0
North Carolina	1.5	0	2.5	2.5	0	0
North Dakota	0.5	0	0.5 ¹	0.5	0	0
Ohio	0.5	1.2	4.0	4.0	0	0
Oklahoma	0.1	0	3.2	3.2	N/R	0
Oregon	0.15	0.20	1.35	1.35	0	0
Pennsylvania	1.0 ¹	0.75	4.5	4.5	0	0
Puerto Rico	N/A	N/R	10.0	10.0	0	0
Rhode Island	1.0	N/R	1.5	1.5	0	0
South Carolina	1.0	N/R	1.8	1.8	0	0
South Dakota	0.5	0	0.14	0.14	0	0
Tennessee	2.0	0	6.0 [*]	6.0 [*]	0	0
Texas	19.5	N/R	N/R	19.5	N/R	0
Utah	1.0	*	2.5	2.5	0	0
Vermont	0	0	1.2	1.2	0	0
Virginia	0.10	0.90	2.5 [*]	2.5	0	0
Virgin Islands	1.0	N/R	1.0	1.0	0	0
Washington	0.5	0	2.5	2.5	0	0

**TABLE D-5
(Continued)**

STATE OR TERRITORY	SBO FUNCTION (NO. FTEs)		SBAP FUNCTION (NO. FTEs)			
	SBO	OTHER STAFF	ALL STAFF	PAID	UNPAID	RETIRED ENGINEERS
West Virginia	1.0	0.2	1.7	1.7	0	0
Wisconsin	0.5	3.0	2.1	2.5	0	0
Wyoming*	0.5	0	1.0	1.0	0	0

N/R No response
N/A Not applicable

***Notes:**

- CT The program leverages technical staff from the Engineering and Enforcement Division to provide additional staff support on specific projects or initiatives. Leveraging additional resources is critical to the operation of the program and to ensure the delivery of quality technical assistance.
- ND Includes only Air Pollution staff, not other media program assistance, which is not funded by Title V fees. For the purpose of this report, assistance activities by media programs (waste management and water pollution control) other than air have not been included throughout the report.
- PA Position vacant since 4/96.
- TN Six positions filled and 6 vacant positions in budget.
- UT Part-time temporary for newsletter production.
- VA 2.5 FTE includes 1.0 FTE for SBAP Leadership Grant; 0.3 FTE from Office of Small Business Assistance Air Toxics Section's 2 engineers providing SBAP outreach and compliance assistance for MACT; and 0.2 FTE considered as SBAP from SBAP Permit Engineer Liaisons, who function in an ad-hoc, on-request manner in the six DEQ regional offices.
- WY For SBO position, 0.5 FTE authorized, 0.2 FTE utilized.

**TABLE D-6
CAP STAFFING**

STATE OR TERRITORY	NUMBER OF PEOPLE ON CAP				
	SMALL BUSINESS OWNER	STATE REGULATORY EMPLOYEE	GENERAL PUBLIC	NOT YET APPOINTED	OTHER
Alabama*	4	1	0	2	
Alaska	4	1	2		
Arizona	4	1	2		
Maricopa County	N/R				
Pima County*	0	0	0		
Arkansas	3	1	3		
California	N/R				
SCAQMD	N/A	N/A	N/A	15*	N/A
Colorado	2	1	2	2*	
Connecticut	4	2	4		
Delaware	1	0	0	6	
District of Columbia	4	1	2		
Florida	3	1	3		
Georgia	4	1	0	2	
Hawaii	N/E				
Idaho	4	1	2		
Illinois	1	1	1	4	0
Indiana	4	1		1	1*
Iowa*	0	0	0	0	0

**TABLE D-6
(Continued)**

STATE OR TERRITORY	NUMBER OF PEOPLE ON CAP				
	SMALL BUSINESS OWNER	STATE REGULATORY EMPLOYEE	GENERAL PUBLIC	NOT YET APPOINTED	OTHER
Kansas	4	1	2		
Kentucky	4	1	2	0	2*
Jefferson County	see KY	see KY	see KY	see KY	see KY
Louisiana	2	2	0	4	
Maine	3	2	2	7*	2*
Maryland	0	0	0	0	0
Massachusetts	*	N/A	N/A	7	
Michigan	1	1	2	1	2*
Minnesota	3	3	2	1	
Mississippi	4	1	2		
Missouri			2	5	
Montana	6	1	0	0	N/A
Nebraska	4	1	2		1*
Nevada	4	1	2	0	
New Hampshire	4	1	2		
New Jersey	4	1	2		
New Mexico	4	1	2	0	
New York	5	1	2	1	
North Carolina	4 of 8	1 of 8	3 of 8	0	0

**TABLE D-6
(Continued)**

STATE OR TERRITORY	NUMBER OF PEOPLE ON CAP				
	SMALL BUSINESS OWNER	STATE REGULATORY EMPLOYEE	GENERAL PUBLIC	NOT YET APPOINTED	OTHER
North Dakota	4	1	2	0	0
Ohio	4	1	2	0	0
Oklahoma	3	1	2	1	0
Oregon	4	1	2	0	1*
Pennsylvania	5	1	3		2*
Puerto Rico	3	1	2	1	
Rhode Island	0	0	0	7	
South Carolina	3	1	1	2*	
South Dakota	4	1	2	0	0
Tennessee	0	0	0	7	
Texas	4	1	2	0	0
Utah	4	1	2	0	1*
Vermont	0	0	0	0	
Virginia	4	1	2		
Virgin Islands	0	0	0	0	0
Washington	2	1	1	3*	0
West Virginia	4	1	2		
Wisconsin	3	2	3	1*	
Wyoming	4	1	2	0	2*

**TABLE D-6
(Continued)**

N/A Not applicable
N/E Not established
N/R No response

***Notes:**

AL	CAP staffing complete as of July 1997.
Pima County, AZ	Rely upon state CAP.
SCAQMD, CA	The Local Government and Small Business Assistance Committee has not yet been formed and is still in the development stage. To be appointed are 4 local government elected officials, 3 AQMD board members, 4 small business representatives, and 4 members of the general public. No CAP in place for state.
CO	Terms expired as of 1/31/97, new appointments have not been made.
IN	Environmental organization.
IA	All pending Governor's appointment.
KY	One person from Economic Development, one person from the local Air Pollution Control District.
ME	7 = 1 small business, 1 business, 1 labor, 1 municipal government, 1 environmental, 2 public health.
ME	2 = 1 business, 1 labor.
MA	Although CAP is not formally established, Secretary of Environmental Affairs meets monthly with leaders of small business community to discuss environmental progress and problems.
MI	2 attorneys.
NE	SBO non-voting member.
OR	In July 1995, the CAP was expanded to 8 members. The eighth member represents Lane Regional Air Pollution Authority (Eugene, OR area) small business interests.
PA	Department of Community and Economic Development designee and ombudsman (vacant).
SC	Positions not refilled after resignations.
UT	Honorary member of Utah Pollution Prevention Association (small business, nonprofit group working to prevent and reduce industry pollution).
WA	Expired terms, replacements to be announced.
WI	Assembly minority leader appointment still vacant.
WY	Major source representatives.

**TABLE D-7
ADMINISTRATIVE LOCATION OF SBTCP COMPONENTS**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Alabama	Office of Education and Outreach in the Environmental Regulatory Agency	Air Division of the Permitting Agency	N/R
Alaska	AK Department of Environmental Conservation, Compliance Assistance Office (non-enforcement)	AK Department of Environmental Conservation, Compliance Assistance Office (non-enforcement)	Private, uncompensated individuals from small businesses and general public appointed by legislature and Governor. One member is employee of the Department (of Environmental Conservation).
Arizona	AZ Department of Environmental Quality, Compliance Assistance Section	AZ Department of Environmental Quality, Compliance Assistance Section	Outside Agency, but managed by AZ Department of Environmental Quality, Compliance Assistance Section
Maricopa County	N/R	Environmental Service (same department as Enforcement)	N/R
Pima County	N/R	Information Services Division of Pima County Department of Environmental Quality	N/R
Arkansas	AR Department of Pollution Control and Ecology (regulatory agency)	AR Department of Pollution Control and Ecology (regulatory agency)	AR Department of Pollution Control and Ecology (regulatory agency)
California	Air Resources Board (ARB), Office of the Ombudsman (part of ARB, Office of the Chairman)	Throughout ARB including Office of the Ombudsman and local Air Pollution Control Districts	ARB, Office of the Chairman
SCAQMD	South Coast Air Quality Management District is a regional (Los Angeles, non-desert portions of Riverside, and San Bernardo counties), single media (air only), regulatory agency. The ombudsman function and outreach function are co-located in the Public Advisor's Office of the agency.		N/A

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Colorado	CO Department of Regulatory Agencies, Office of Regulatory Reform (function will move to CO Department of Public Health and Environment / CDPHE, Customer Service Center in 7/97)	CO Department of Public Health & Environment / CDPHE, Air Pollution Control Division, Stationary Sources	Independent, located outside of agencies, individuals appointed as defined in Section 507
Connecticut	CT Department of Environmental Protection (regulatory agency)	CT Department of Environmental Protection (regulatory agency)	CT Department of Environmental Protection (regulatory agency)
Delaware	Office of the Secretary, DE Department of Natural Resources and Environmental Control	DNREC, Division of Air and Waste Management, Engineering and Compliance (referred to for technical assistance by Ombudsman)	N/R
District of Columbia	State regulatory agency	State regulatory agency	State regulatory agency
Florida	Department of Environmental Protection, Division of Air Resource Management, Bureau of Air Regulation	Department of Environmental Protection, Division of Air Resource Management, Bureau of Air Regulation	Independent
Georgia	Environmental Protection Division, Air Protection Branch	Environmental Protection Division, Air Protection Branch	One CAP member is program manager in Air Protection Branch. Others located outside all agencies with each individual appointed as per Section 507.
Hawaii	State Department of Health, Deputy Director of Environmental Health	State Department of Health, Environmental Management Division, Clean Air Branch	Independent
Idaho	Division of Environmental Quality, Planning and Support Services, Performance Management Bureau	Division of Environmental Quality, Air and Hazardous Waste, Technical Services Bureau	Outside of all agencies, appointed as defined by Section 507

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Illinois	IL Environmental Protection Agency	IL Department of Commerce and Community Affairs, Small Business Division	N/R
Indiana	IN Department of Environmental Affairs Management, Office of Business Relations and Legislative Affairs	IN Department of Environmental Management, Office of Pollution Prevention and Technical Assistance	Independent
Iowa	IA Citizens' Aide/Ombudsman's Office (a legislative office)	IA Air Emissions Assistance Program (IAEAP), Iowa Waste Reduction Center (IWRC), University of Northern Iowa	Pending Governor appointment
Kansas	Department of Health and Environment, Office of Pollution Prevention (non-regulatory)	Contracted: University of Kansas with subcontracts to Kansas State University and Wichita State University	Independent
Kentucky	Office of the Secretary, Natural Resources and Environmental Protection Cabinet	Contracted: Center for Entrepreneurship, Gatton College of Business and Economics, University of Kentucky	Panel members appointed by Executive Order of Governor
Jefferson County	Department of Planning and Environmental Management, Jefferson County	Air Pollution Control District, Jefferson County	See KY above
Louisiana	Governor's Office until October 31; Department of Environmental Quality, Office of the Secretary from November 1	Department of Environmental Quality, Air Quality Division	No permanent location
Maine	Department of Environmental Protection	Department of Environmental Protection	Outside Department (as defined by Section 507)

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Maryland	MD Department of the Environment, Office of Communication (state regulatory agency)	MD Department of the Environment, Environmental Permits Service Center (state regulatory agency)	N/A
Massachusetts	Office of Technical Assistance*	Department of Environmental Protection and Office of Technical Assistance*	Not established
Michigan	MI Jobs Commission, Business Ombudsman's Office	MI Department of Environmental Quality, Environmental Assistance Division	N/A
Minnesota	MN Pollution Control Agency, Environmental Planning and Review Office	MN Pollution Control Agency, Air Quality Division, Manager's Office	N/R
Mississippi	Department of Environmental Quality	Department of Environmental Quality	Outside
Missouri	Governor's Office	MO Department of Natural Resources' Division of Environmental Quality's Technical Assistance Program	Independent and located outside all agencies
Montana	Pollution Prevention Bureau of Planning Division (non-regulatory division of MT Department of Environmental Quality)	Pollution Prevention Bureau of Planning Division (non-regulatory division of MT Department of Environmental Quality) – Small Business Engineer located in Air and Waste Management Bureau of Department's Permitting and Compliance Division	Administered by CAP Chairperson in Billings and Secretary in Helena
Nebraska	SBO, SBAP, and CAP are directed by one person, the Public Advocate, who is located in the Management Services section of NE Department of Environmental Quality.		

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Nevada	NV Division of Environmental Protection - Office of the Administrator	NV Division of Environmental Protection - Office of the Administrator*	NV Division of Environmental Protection (independent, SBO and SBAP staff serve as staff members to CAP)
NV Bureau of Air Quality	NV Division of Environmental Protection, Bureau of Air Quality (Division is main state regulatory agency for most environmental issues, and the Bureau has control over air issues with exception of most air quality sources located in Washoe and Clark Counties.)		
Washoe County Air	Washoe County District Health Department, Air Quality Management (County regulatory agency for most air quality issues.)		
Clark County Air	Clark County Health District, Air Pollution Control Division (County regulatory agency for most air quality issues.)		
BEP-UNR	NV Small Business Development Centers (Certain outreach services have been contracted to the "Business Environmental Program" at University of Nevada, Reno.)		
New Hampshire	NH Department of Environmental Services, Office of the Commissioner	NH Department of Environmental Services, Air Resources Division	Independent with administrative support from SBAP and DES Air Resources Division
New Jersey	NJ Department of Commerce & Economic Development, Division of Economic Development	NJ Department of Environmental Protection, Permit Coordination and Pollution Prevention Element	NJ Department of Environmental Protection
New Mexico	NM Environmental Department, Air Quality Bureau	NM Environmental Department, Air Quality Bureau	Independent
New York	NY State Empire State Development, Division for Small Business (non-regulatory state agency)	NY State Environmental Facilities Corporation, Technical Advisory Services Division (non-regulatory public benefit corporation)	NY State Department of Environmental Conservation, Division of Air Resources, Bureau of Technical Support (administrative location and contact point of CAP)

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
North Carolina	NC Department of Environment, Health and Natural Resources, Division of Pollution Prevention and Environmental Assistance	NC Department of Environment, Health and Natural Resources, Division of Pollution Prevention and Environmental Assistance	Independent
North Dakota	ND Department of Health, Environmental Health Section, Chief's Office	ND Department of Health, Division of Environmental Engineering	Independent and located outside all agencies
Ohio	Clean Air Resource Center, OH Air Quality Development Authority (independent, non-regulatory, financing agency)	OH Environmental Protection Agency, Division of Air Pollution Control	Appointed as defined in Section 507
Oklahoma	ODEQ, Executive Director's Office	ODEQ, Customer Services Division	ODEQ, Customer Services Division
Oregon	Department of Environmental Quality, Director's Office	Department of Environmental Quality, Air Quality Division	Outside agency. Liaison to SBAP, SBO; Small Businesses.
Pennsylvania	SBO funded by PA Department of Environmental Protection and utilizes local service providers, which are funded by Department of Community and Economic Development	Contracted: PRC Environmental Management, Inc. SBAP has received cooperation from trade associations, utilities, and district libraries in delivering services.	PA DEP provides administrative and technical support to the committee. CAP meetings held in Department's building.
Puerto Rico	Commercial Development Administration Executive Office (position not reappointed)	Environmental Quality Board, Air Quality Area, Planning Division	Not in full operation - as defined in Section 507
Rhode Island	RI Department of Environmental Management, Office of the Director	RI Department of Environmental Management, Office of Technical and Customer Assistance (1 FTE) and University of Rhode Island, Center for Pollution Prevention (0.5 FTE)	Outside state agencies; individuals appointed as per Section 507

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
South Carolina	Department of Health and Environmental Control, Environmental Quality Control Administration	Department of Health and Environmental Control, Environmental Quality Control Administration	Department of Health and Environmental Control, Environmental Quality Control Administration
South Dakota	SBO supervised by Secretary of the Department.	Individuals that work with the air program all contribute to the success of the SBAP.	Made up of individuals across state with a good mixture of private individuals and small business owners.
Tennessee	TN Department of Environment & Conservation, Deputy Commissioner's Office	TN Department of Environment & Conservation, Pollution Prevention/Environmental Awareness Division	Not operating
Texas	TNRCC, SBAP	TNRCC, SBAP	TNRCC, SBAP
Utah	UT Department of Environmental Quality, Executive Director's Office	UT Department of Environmental Quality, Division of Air Quality, Operating Permits Section	UT Department of Environmental Quality, Division of Air Quality
Vermont	Not yet established	Department of Environmental Conservation, Environmental Assistance Division	Not yet established
Virginia	Department of Environmental Quality, Air Division	Department of Environmental Quality, Air Division	Appointed as per Section 507- all outside appointments except DEQ appointment
US Virgin Islands	Small Business Development Agency, Department of Tourism	Department of Planning and Natural Resources	None

**TABLE D-7
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF LOCATION		
	SBO	SBAP	CAP
Washington	SBO is agency representative to Governor's Small Business Improvement Council composed of small business owners and various state agencies responsible for regulating the state's businesses. SBO is agency representative to Unified Business Identifier (UBI) Board composed of state and federal regulatory agencies impacting primarily small businesses.	SBAP supports and is supported by the following cooperative relationships: (1) Technical assistance staff for business-related pollution control/prevention exist in other Ecology programs. (2) Outreach and assistance staff in 4 of states' 7 local air authorities. (3) Moderate risk waste staff in state's 39 counties.	One CAP member is legislative liaison for Air Quality Program. All others are unpaid volunteers (per diem travel, lodging, and meals reimbursed). Staff support provided by SBAP.
West Virginia	WV Division of Environmental Protection	WV Department of Environmental Protection, Office of Air Quality	Outside of all agencies, as per Section 507
Wisconsin	Department of Commerce, Bureau of Small Business and Permit Assistance, Division of Marketing Advocacy and Technology Development	Department of Commerce, Bureau of Small Business and Permit Assistance, Department of Natural Resources	Outside of all state agencies, includes small business owners and other state agencies
Wyoming	WY Department of Environmental Quality, Administration Division	WY Department of Environmental Quality, Air Quality Division	Independent citizens panel appointed by legislature, governor, and Department; outside any state agency with statewide meetings

N/A Not applicable
N/R No response

**TABLE D-7
(Continued)**

***Notes**

- MA** SBO: SBAP manager at OTA functions as SBO and receives all communications routinely directed to SBO. Secretary of Environmental Affairs, Trudy Coxe, Executive Office of Environmental Affairs, routinely meets with business leaders to solicit input on problems and programs.
- MA** SBAP: According to November 1992 SIP, program functions are divided between DEP and OTA. DEP currently is reorganizing and has established a "business customer support unit," which deals with permits, compliance and enforcement activities related to industrial and commercial entities. We routinely collaborate with DEP on compliance assistance programs, including Printers Partnership (MP2), all Environmental Results Program (ERP) sectors, and special outreach projects such as one targeted for the autobody refinishing industry currently under development. This means that all such programs impacting small business in MA receive the benefits of SBAP-oriented planning being incorporated into DEP programs, which are then implemented by DEP staff within the state's five regions. For example, in the MP2 program, several DEP personnel accounted for more than 2,000 person/hours, OTA/SBAP staff for 1,750. For the ERP program, DEP and OTA staff have devoted considerable time and resources in 1996 to the development and implementation of programs affecting small business.
- NV** Also provides services to all industries and general public on other medias as well as air.

**TABLE D-7
(Continued)**

Three states have contracted the management of the SBAP to an outside entity. Information on SBAP contractors is provided below.

STATE	CONTRACTED COMPANY
Kansas	<p>Mr. Frank Orzulak University of Kansas Center for Environmental Education and Training Continuing Education Building University of Kansas Lawrence, KS 66045-2608 913-864-3978 913-864-5827 fax Current budget: \$340,000 Term of contract: July 1 - July 1 annual renewal</p>
Kentucky	<p>Mr. Gregory C. Copley, Director, Business Environmental Assistance Program Center for Entrepreneurship Gatton College of Business and Economics University of Kentucky Lexington, KY 40506-0034 606-257-1131 606-323-1907 fax Current budget: \$250,000 Term of contract: July 1, 1996 - June 30, 1997</p>
Pennsylvania	<p>Mr. Joseph Knox PRC Environmental Management, Inc. 1800 John F. Kennedy Boulevard, Sixth Floor Philadelphia, PA 19103 215-972-0444 800-722-4743 215-972-0484 fax Current budget: \$300,000 Term of contract: Five years</p>

APPENDIX E

SBTCP ACTIVITIES AND SERVICES

APPENDIX E-1
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF STATES
(DATA FROM 1996 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Dry Cleaners/Laundry Services	37	8,592	440	9,032
Auto/Body Maintenance/Refinishing/Rep	36	7,846	1,292	9,138
Printing/Graphic Arts	32	2,982	184	3,166
Metal Fabrication/Finishing/Forging/Cast	27	2,172	167	2,339
Wood Products/Furniture/Finishing	25	4,207	237	4,444
Attorney/Consultants/Engineers	17	1,885	10	1,895
Other	16	23,150	592	23,742
Gasoline Distribution (Wholesale/Retail)	16	1,738	75	1,813
Chrome Plating	15	286	10	296
Construction/Contractor	14	302	123	425
Concrete/Aggregate	14	196	42	238
Manufacturing	14	1,791	64	1,855
Petroleum/Products/Storage	13	283	41	324
Chemicals/Products	12	222	21	243
Agriculture/Farming/Crop Service	11	313	16	329
Electric Equipment/Repair	10	353	25	378
Plastic Manufacturing/Products	10	52	51	103
Schools	10	158	6	164
Organizations/Associations	10	310	3	313
Mining and Minerals	10	59	9	68
Electroplating	9	77	22	99
Machine/Manufacturing & Repair	9	180	29	209
Food Products/Processing/Beverages	9	266	11	277
Sawmills/Logging/Wood Products	9	205	10	215
Paints and Painting	8	70	7	77
Private Citizen	8	610	4	614
Government	8	557	8	565
Cut/Crushed Stone Products/Glass	8	198	24	222
Hospitals/Medical/Health Services	8	77	2	79
Grains/Grain Elevators	7	169	18	187
Furniture Manufacture/Repair/Sales	7	144	7	151
Utilities	7	79	0	79
Foundry/Smelter	7	19	9	28
Transportation Services/Equipment	7	30	12	42
Asphalt	6	16	5	21
Recycler	6	98	18	116
Textiles	6	23	8	31
Rubber/Products	6	52	11	63
Wholesale/Retail Goods	6	55	3	58
Auto Dealers	5	537	25	562
Metals	5	30	5	35

APPENDIX E-1
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF STATES
(DATA FROM 1996 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Boat Manufacturing	5	6	25	31
Waste/Waste Hauler	5	91	5	96
Business Services	5	321	4	325
Sand & Gravel	5	22	11	33
Airports/Air Transportation	5	35	2	37
Plumbing/HVAC	5	557	5	562
Brick/Tile	4	7	6	13
Landfills/Landfill Gas	4	101	3	104
Research & Testing Facilities/Laboratories	4	24	2	26
Dairy/Feedlots/Livestock	4	18	4	22
Fabricated Structural Metal	4	1	10	11
Paper Manufacturing/Products	4	53	0	53
Newspapers	4	14	1	15
Personal Services	4	88	2	90
Analytical/Medical Instruments	4	16	3	19
Leather/Fur	4	7	3	10
Repair	3	3	2	5
Motor Vehicles and Equipment	3	21	1	22
Restaurants	3	379	35	414
Machine Shop	3	9	6	15
Clothing	3	3	0	3
Veterinarians/Veterinary Incinerators	3	34	3	37
Water/Wastewater	3	31	1	32
Cotton Gins	3	52	3	55
Engines and Turbines	3	13	4	17
Bakery	3	70	3	73
Remediation	2	99	0	99
Portable Equipment	2	193	1	194
Advertising/Communications	2	7	1	8
Incinerators	2	44	0	44
Real Estate	2	17	1	18
Boilers	2	1,029	0	1,029
Adhesives	2	247	0	247
Degreasers	2	46	0	46
Crematories	2	4	2	6
Aerospace	2	30	1	31
Jewelry Manufacturing	2	4	2	6
Asbestos	2	27	0	27
Media	2	7	0	7
Solvents	2	26	0	26
Tires	2	5	2	7

APPENDIX E-1
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF STATES
(DATA FROM 1996 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Hotels/Motels	2	4	0	4
Ethylene Oxide	2	3	0	3
Screw Machine Products/Bolts	1	1	0	1
Warehouse/Storage	1	10	4	14
Thermoset	1	79	1	80
Television/Radio	1	1	0	1
TRI	1	450	2	452
Welding Shop	1	0	1	1
Software	1	0	6	6
Wire	1	0	1	1
Title V Affected Industry	1	254	8	262
Smoking Vehicles	1	9	0	9
Self Audits	1	86	0	86
Trona Process	1	5	0	5
Tribal	1	2	0	2
Abrasive Blasting	1	344	0	344
Churches	1	7	0	7
Casino	1	1	0	1
Environmental Equipment	1	4	0	4
Emergency Generators	1	2	0	2
Cutlery/Handtools/Hardware	1	5	0	5
Environmental Quality & Housing Progra	1	40	1	41
Equipment Rental	1	1	0	1
Banks	1	4	0	4
Auto Wrecking	1	1	0	1
Apartment Houses	1	3	0	3
Environmental Programs	1	238	0	238
Race Track	1	1	0	1
Marine	1	2	0	2
Household Appliances	1	6	0	6
P2 Conference	1	700	0	700
Ordnance	1	0	1	1
Optical	1	2	2	4
Pharmaceuticals	1	6	0	6
Fiberglass	1	2	0	2
Glass	1	0	1	1
Forestry	1	7	0	7
Flower Shops	1	2	0	2
Landscaping	1	1	1	2
TOTALS		66,433	3,829	70,262

APPENDIX E-2
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ASSISTANCES
(DATA FROM 1996 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Other	16	23,150	592	23,742
Auto/Body Maintenance/Refinishing/Rep	36	7,846	1,292	9,138
Dry Cleaners/Laundry Services	37	8,592	440	9,032
Wood Products/Furniture/Finishing	25	4,207	237	4,444
Printing/Graphic Arts	32	2,982	184	3,166
Metal Fabrication/Finishing/Forging/Cast	27	2,172	167	2,339
Attorney/Consultants/Engineers	17	1,885	10	1,895
Manufacturing	14	1,791	64	1,855
Gasoline Distribution (Wholesale/Retail)	16	1,738	75	1,813
Boilers	2	1,029	0	1,029
P2 Conference	1	700	0	700
Private Citizen	8	610	4	614
Government	8	557	8	565
Plumbing/HVAC	5	557	5	562
Auto Dealers	5	537	25	562
TRI	1	450	2	452
Construction/Contractor	14	302	123	425
Restaurants	3	379	35	414
Electric Equipment/Repair	10	353	25	378
Abrasive Blasting	1	344	0	344
Agriculture/Farming/Crop Service	11	313	16	329
Business Services	5	321	4	325
Petroleum/Products/Storage	13	283	41	324
Organizations/Associations	10	310	3	313
Chrome Plating	15	286	10	296
Food Products/Processing/Beverages	9	266	11	277
Title V Affected Industry	1	254	8	262
Adhesives	2	247	0	247
Chemicals/Products	12	222	21	243
Environmental Programs	1	238	0	238
Concrete/Aggregate	14	196	42	238
Cut/Crushed Stone Products/Glass	8	198	24	222
Sawmills/Logging/Wood Products	9	205	10	215
Machine/Manufacturing & Repair	9	180	29	209
Portable Equipment	2	193	1	194
Grains/Grain Elevators	7	169	18	187
Schools	10	158	6	164
Furniture Manufacture/Repair/Sales	7	144	7	151
Recycler	6	98	18	116
Landfills/Landfill Gas	4	101	3	104
Plastic Manufacturing/Products	10	52	51	103

APPENDIX E-2
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ASSISTANCES
(DATA FROM 1996 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Remediation	2	99	0	99
Electroplating	9	77	22	99
Waste/Waste Hauler	5	91	5	96
Personal Services	4	88	2	90
Self Audits	1	86	0	86
Thermoset	1	79	1	80
Utilities	7	79	0	79
Hospitals/Medical/Health Services	8	77	2	79
Paints and Painting	8	70	7	77
Bakery	3	70	3	73
Mining and Minerals	10	59	9	68
Rubber/Products	6	52	11	63
Wholesale/Retail Goods	6	55	3	58
Cotton Gins	3	52	3	55
Paper Manufacturing/Products	4	53	0	53
Degreasers	2	46	0	46
Incinerators	2	44	0	44
Transportation Services/Equipment	7	30	12	42
Environmental Quality & Housing Progra	1	40	1	41
Airports/Air Transportation	5	35	2	37
Veterinarians/Veterinary Incinerators	3	34	3	37
Metals	5	30	5	35
Sand & Gravel	5	22	11	33
Water/Wastewater	3	31	1	32
Aerospace	2	30	1	31
Textiles	6	23	8	31
Boat Manufacturing	5	6	25	31
Foundry/Smelter	7	19	9	28
Asbestos	2	27	0	27
Research & Testing Facilities/Laboratori	4	24	2	26
Solvents	2	26	0	26
Motor Vehicles and Equipment	3	21	1	22
Dairy/Feedlots/Livestock	4	18	4	22
Asphalt	6	16	5	21
Analytical/Medical Instruments	4	16	3	19
Real Estate	2	17	1	18
Engines and Turbines	3	13	4	17
Machine Shop	3	9	6	15
Newspapers	4	14	1	15
Warehouse/Storage	1	10	4	14
Brick/Tile	4	7	6	13

APPENDIX E-2
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ASSISTANCES
(DATA FROM 1996 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Fabricated Structural Metal	4	1	10	11
Leather/Fur	4	7	3	10
Smoking Vehicles	1	9	0	9
Advertising/Communications	2	7	1	8
Media	2	7	0	7
Forestry	1	7	0	7
Tires	2	5	2	7
Churches	1	7	0	7
Software	1	0	6	6
Jewelry Manufacturing	2	4	2	6
Crematories	2	4	2	6
Household Appliances	1	6	0	6
Pharmaceuticals	1	6	0	6
Repair	3	3	2	5
Trona Process	1	5	0	5
Cutlery/Handtools/Hardware	1	5	0	5
Banks	1	4	0	4
Environmental Equipment	1	4	0	4
Hotels/Motels	2	4	0	4
Optical	1	2	2	4
Ethylene Oxide	2	3	0	3
Clothing	3	3	0	3
Apartment Houses	1	3	0	3
Tribal	1	2	0	2
Landscaping	1	1	1	2
Fiberglass	1	2	0	2
Emergency Generators	1	2	0	2
Marine	1	2	0	2
Flower Shops	1	2	0	2
Glass	1	0	1	1
Wire	1	0	1	1
Welding Shop	1	0	1	1
Equipment Rental	1	1	0	1
Television/Radio	1	1	0	1
Screw Machine Products/Bolts	1	1	0	1
Auto Wrecking	1	1	0	1
Ordnance	1	0	1	1
Race Track	1	1	0	1
Casino	1	1	0	1
TOTALS		66,433	3,829	70,262

APPENDIX E-3
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ON-SITE ASSISTANCES
(DATA FROM 1996 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Auto/Body Maintenance/Refinishing/Rep	36	7,846	1,292	9,138
Other	16	23,150	592	23,742
Dry Cleaners/Laundry Services	37	8,592	440	9,032
Wood Products/Furniture/Finishing	25	4,207	237	4,444
Printing/Graphic Arts	32	2,982	184	3,166
Metal Fabrication/Finishing/Forging/Cast	27	2,172	167	2,339
Construction/Contractor	14	302	123	425
Gasoline Distribution (Wholesale/Retail)	16	1,738	75	1,813
Manufacturing	14	1,791	64	1,855
Plastic Manufacturing/Products	10	52	51	103
Concrete/Aggregate	14	196	42	238
Petroleum/Products/Storage	13	283	41	324
Restaurants	3	379	35	414
Machine/Manufacturing & Repair	9	180	29	209
Electric Equipment/Repair	10	353	25	378
Auto Dealers	5	537	25	562
Boat Manufacturing	5	6	25	31
Cut/Crushed Stone Products/Glass	8	198	24	222
Electroplating	9	77	22	99
Chemicals/Products	12	222	21	243
Recycler	6	98	18	116
Grains/Grain Elevators	7	169	18	187
Agriculture/Farming/Crop Service	11	313	16	329
Transportation Services/Equipment	7	30	12	42
Rubber/Products	6	52	11	63
Sand & Gravel	5	22	11	33
Food Products/Processing/Beverages	9	266	11	277
Attorney/Consultants/Engineers	17	1,885	10	1,895
Fabricated Structural Metal	4	1	10	11
Chrome Plating	15	286	10	296
Sawmills/Logging/Wood Products	9	205	10	215
Foundry/Smelter	7	19	9	28
Mining and Minerals	10	59	9	68
Title V Affected Industry	1	254	8	262
Textiles	6	23	8	31
Government	8	557	8	565
Furniture Manufacture/Repair/Sales	7	144	7	151
Paints and Painting	8	70	7	77
Machine Shop	3	9	6	15
Brick/Tile	4	7	6	13
Software	1	0	6	6

APPENDIX E-3
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ON-SITE ASSISTANCES
(DATA FROM 1996 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Schools	10	158	6	164
Waste/Waste Hauler	5	91	5	96
Metals	5	30	5	35
Plumbing/HVAC	5	557	5	562
Asphalt	6	16	5	21
Private Citizen	8	610	4	614
Engines and Turbines	3	13	4	17
Dairy/Feedlots/Livestock	4	18	4	22
Warehouse/Storage	1	10	4	14
Business Services	5	321	4	325
Landfills/Landfill Gas	4	101	3	104
Leather/Fur	4	7	3	10
Wholesale/Retail Goods	6	55	3	58
Analytical/Medical Instruments	4	16	3	19
Bakery	3	70	3	73
Veterinarians/Veterinary Incinerators	3	34	3	37
Organizations/Associations	10	310	3	313
Cotton Gins	3	52	3	55
TRI	1	450	2	452
Repair	3	3	2	5
Optical	1	2	2	4
Personal Services	4	88	2	90
Airports/Air Transportation	5	35	2	37
Tires	2	5	2	7
Jewelry Manufacturing	2	4	2	6
Crematories	2	4	2	6
Hospitals/Medical/Health Services	8	77	2	79
Research & Testing Facilities/Laboratories	4	24	2	26
Welding Shop	1	0	1	1
Real Estate	2	17	1	18
Thermoset	1	79	1	80
Portable Equipment	2	193	1	194
Wire	1	0	1	1
Water/Wastewater	3	31	1	32
Landscaping	1	1	1	2
Aerospace	2	30	1	31
Ordinance	1	0	1	1
Environmental Quality & Housing Programs	1	40	1	41
Glass	1	0	1	1
Motor Vehicles and Equipment	3	21	1	22
Newspapers	4	14	1	15

APPENDIX E-3
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE
RANKED IN DECREASING ORDER BY NUMBER OF ON-SITE ASSISTANCES
(DATA FROM 1996 SECTION 507 REPORT)

INDUSTRY SECTOR	NUMBER OF STATES	NUMBER OF ASSISTANCES		
		GENERAL	ON-SITE	TOTAL
Advertising/Communications	2	7	1	8
Utilities	7	79	0	79
Emergency Generators	1	2	0	2
Degreasers	2	46	0	46
Cutlery/Handtools/Hardware	1	5	0	5
Clothing	3	3	0	3
Churches	1	7	0	7
Casino	1	1	0	1
Solvents	2	26	0	26
Tribal	1	2	0	2
Trona Process	1	5	0	5
Screw Machine Products/Bolts	1	1	0	1
Boilers	2	1,029	0	1,029
Banks	1	4	0	4
Auto Wrecking	1	1	0	1
Asbestos	2	27	0	27
Apartment Houses	1	3	0	3
Television/Radio	1	1	0	1
P2 Conference	1	700	0	700
Environmental Equipment	1	4	0	4
Race Track	1	1	0	1
Hotels/Motels	2	4	0	4
Paper Manufacturing/Products	4	53	0	53
Pharmaceuticals	1	6	0	6
Media	2	7	0	7
Marine	1	2	0	2
Adhesives	2	247	0	247
Incinerators	2	44	0	44
Household Appliances	1	6	0	6
Smoking Vehicles	1	9	0	9
Self Audits	1	86	0	86
Remediation	2	99	0	99
Forestry	1	7	0	7
Flower Shops	1	2	0	2
Fiberglass	1	2	0	2
Ethylene Oxide	2	3	0	3
Equipment Rental	1	1	0	1
Environmental Programs	1	238	0	238
Abrasive Blasting	1	344	0	344
TOTALS		66,433	3,829	70,262

APPENDIX E-4
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1996 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/L
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
AL		NO INFORMATION PROVIDED				
AK	Livestock and Animal Specialties	3		3	unknown	
AK	Agricultural Services	0	1	1	unknown	
AK	Oil & Gas Field Exploration Services	16		16	unknown	
AK	Mining & Quarrying of Nonmetallic Materials	3		3	unknown	
AK	General Contractors - Building Construct	2		2	unknown	
AK	General Contractors-Not Residential Hon	4		4	unknown	
AK	Soil Remediation Units	3		3	unknown	
AK	Prepared Fish or Frozen Fish/Seafood	4		4	unknown	
AK	Sawmills & Planing Mills	2		2	unknown	
AK	Wood Products, NEC	5		5	unknown	
AK	Printing & Publishing	2		2	unknown	
AK	Newspapers, Publishing & Printing	3		3	unknown	
AK	Periodicals, Publishing & Printing	3		3	unknown	
AK	Fabricated Metal Products	1		1	unknown	
AK	Process Control Instruments	2		2	unknown	
AK	Trucking & Courier Services, Except Air	4	2	6	unknown	
AK	Air Transportation	2	1	3	unknown	
AK	Airports, Flying Fields, & Airport Terminal	4		4	unknown	
AK	Radio Broadcasting Stations	1		1	unknown	
AK	Communication/Services	0	1	1	unknown	
AK	Electric Services	11	1	12	unknown	
AK	Gas Production & Distribution	2		2	unknown	
AK	Combination Electric, Gas & Other Utility	2		2	unknown	
AK	Sewerage Systems	4		4	unknown	
AK	Refuse Systems	31		31	unknown	
AK	Professional & Commercial Equipment/Su	4	1	5	unknown	
AK	Industrial Machinery, Equipment, & Suppl	16	1	17	unknown	
AK	Groceries & Related Products	4		4	unknown	
AK	Automotive Dealers	1		1	unknown	
AK	Gasoline Service Stations	1		1	unknown	
AK	Men's & Boy's Clothing/Accessories	1		1	unknown	
AK	Misc. Retail Stores, NEC	1		1	unknown	
AK	Banks, Commercial	4		4	unknown	
AK	Subdividers & Developers	1		1	unknown	
AK	Hotels & Lodging House Operated by Me	3		3	unknown	
AK	Dry Cleaning Plants	16	1	17	40	42.50
AK	Business Services	23	1	24	unknown	
AK	Advertising, NEC	2		2	unknown	
AK	Automotive Repair Shops, General	4	1	5	unknown	
AK	Health Services	1		1	unknown	
AK	Legal Services	3		3	unknown	
AK	Elementary & Secondary Schools	1	1	2	unknown	
AK	Colleges, Universities, & Professional Sch	21	1	22	unknown	
AK	Schools & Professional Services, NEC	1	1	2	unknown	
AK	Social Services, NEC	1		1	unknown	
AK	Business Associations	17	1	18	unknown	
AK	Professional Associations	3		3	unknown	
AK	Political Organizations	7		7	unknown	
AK	Member Organizations, NEC	5		5	unknown	
AK	Engineering Services	27	2	29	unknown	
AK	Management Consulting Services	4		4	unknown	
AK	Business Consulting Services, NEC	19	1	20	unknown	
AK	Private Households (Domestic Services)	178	1	179	unknown	
AK	Executive, Legislative, & General Govt.	63	3	66	unknown	
AK	Justice, Public Order, & Safety	2		2	unknown	
AK	Environmental Quality & Housing Program	40	1	41	unknown	
AK	Admin. of Transportation	1		1		
AK	National Security & International Affairs	15		15		
AZ	Government, City	19	0	19		
AZ	Government, County	14	0	14		
AZ	Government, State	63	3	66		
AZ	Government, Federal	13	1	14		
AZ	Non-profit Organization	28	0	28		
AZ	Civic Organization	6	0	6		
AZ	Lawyer	13	0	13		
AZ	Vendor/Supplier	14	0	14		
AZ	Recycler	9	0	9		
AZ	Tribal	2	0	2		
AZ	Consultant/Engineer	121	0	121		
AZ	Private Citizen	210	0	210		
AZ	Media	6	0	6		
AZ	Agriculture	1	0	1		

APPENDIX E-4
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1996 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/E
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
AZ	Aerospace Manufacturing/Repair	9	1	10		
AZ	Automotive Repair/Body Shop	19	3	22		
AZ	Chemical Manufacturing	8	1	9		
AZ	Construction	17	4	21		
AZ	Composites/Plastics	1	0	1		
AZ	Dry Cleaner/Laundry	19	2	21		
AZ	Educational Institution	25	0	25		
AZ	Electroplater	2	0	2		
AZ	Electronic Manufacturing	5	0	5		
AZ	Equipment Manufacturing/Repair	1	0	1		
AZ	Furniture/Shutters	3	0	3		
AZ	Health Services	3	0	3		
AZ	Metal Fabricating/Finishing	9	1	10		
AZ	Mining Extraction	6	0	6		
AZ	Paint Applicator	1	0	1		
AZ	Printing/Publishing	9	0	9		
AZ	Stone/Clay/Glass	4	0	4		
AZ	Transportation Services/Equipment	1	0	1		
AZ	Utilities	8	0	8		
AZ	Wood Treatment	3	1	4		
Maricopa Ct	Auto Body	12	25	37		
Maricopa Ct	Bakeries	2	3			
Maricopa Ct	Concrete Plants	2	2	4		
Maricopa Ct	Crematories	3	2	5		
Maricopa Ct	Cultured Marble	2	2	4		
Maricopa Ct	Dry Cleaner	6	4	10		
Maricopa Ct	Engine Repair	6	3	9		
Maricopa Ct	Fiberglass	3	4	7		
Maricopa Ct	Foundries	2	4	6		
Maricopa Ct	Wood Products	10	9	19		
Maricopa Ct	Gas Service Stations	2	1	3		
Maricopa Ct	Laboratories	1	1	2		
Maricopa Ct	Paint Manufacturing	1	1	2		
Maricopa Ct	Electroplating Operations	2	2	4		
Maricopa Ct	Printing	17	13	30		
Maricopa Ct	Sand & Gravel	2	2	4		
Pima Cty, A:	Unspecified Sources	8	0	8	unknown	
Pima Cty, A:	Landscape & Horticulture Services	1	1	2	unknown	
Pima Cty, A:	Mines	1	1	2	5	40
Pima Cty, A:	Sand & Gravel	1	1	2	10	20
Pima Cty, A:	General Building Contractors	1	0	1	unknown	
Pima Cty, A:	Roofers	1	0	1	unknown	
Pima Cty, A:	Special Trade Organization	0	1	1	unknown	
Pima Cty, A:	Misc. Food Products	1	0	1	unknown	
Pima Cty, A:	Misc. Furniture & Fixtures	0	2	2	unknown	
Pima Cty, A:	Printing Trade Services	0	1	1	unknown	
Pima Cty, A:	Plastic Materials & Synthetics	4	2	6	unknown	
Pima Cty, A:	Paints & Allied Products	1	0	1	unknown	
Pima Cty, A:	Hoses, Belts, & Gaskets	2	0	2	unknown	
Pima Cty, A:	Glass	0	1	1	unknown	
Pima Cty, A:	Concrete, Gypsum, & Plaster Products	1	1	2	unknown	
Pima Cty, A:	Cut Stone & Stone Products	0	1	1	unknown	
Pima Cty, A:	Misc. Primary Metals	1	0	1	unknown	
Pima Cty, A:	Fabricated Structural Metal Products	0	1	1	unknown	
Pima Cty, A:	Fabricated Metal Products, Misc.	1	2	3	unknown	
Pima Cty, A:	Construction & Related Machinery	1	0	1	unknown	
Pima Cty, A:	Metalworking Machinery	0	2	2	unknown	
Pima Cty, A:	Electrical Industrial Apparatus	0	1	1	unknown	
Pima Cty, A:	Electrical Components	1	1	2	unknown	
Pima Cty, A:	Jewelry, Silverware, & Plated Ware	1	0	1	unknown	
Pima Cty, A:	Auto Dealers & Service Stations	1	0	1	unknown	
Pima Cty, A:	Gasoline Service Stations	1	0	1	unknown	
Pima Cty, A:	Restaurants	0	1	1	unknown	
Pima Cty, A:	Shopping Goods Stores, Misc.	0	1	1	unknown	
Pima Cty, A:	Hotels & Motels	1	0	1	unknown	
Pima Cty, A:	Laundry, Cleaning, & Garment Services	1	3	4	unknown	
Pima Cty, A:	Equipment Rentals & Leases, Misc.	1	0	1	unknown	
Pima Cty, A:	Computer & Data Processing	1	0	1	unknown	
Pima Cty, A:	Business Services, Misc.	1	0	1	unknown	
Pima Cty, A:	Auto Repair Shops	4	9	13	unknown	
Pima Cty, A:	Auto Services, Not Repair	0	1	1	unknown	
Pima Cty, A:	Hospitals	1	1	2	unknown	

APPENDIX E-4
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1996 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/C
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
Pima Cty, A:	Medical & Dental Laboratories	0	1	1	unknown	
Pima Cty, A:	Schools & Educational Services	1	0	1	unknown	
Pima Cty, A:	Engineering Services	6	0	6	unknown	
Pima Cty, A:	Government	3	1	4	unknown	
AR	Title V Affected Industry	254	8	262	362	72
AR	Solid Waste Landfills	83	1	84	86	98
AR	Metal Fabrication	254	6	230	1491	15
AR	Recycling	41	1	42	354	12
CA	N/R					
Kern Cty, C/	Dry Cleaners		6	6	6	100
Kern Cty, C/	Spray Painters		27	27	27	100
Placer Cty, C	Auto Refinishing	24 workshops		24	50	48
Placer Cty, C	Dry Cleaners	37	0	37	37	100
Placer Cty, C	Landfill Gas	1	0	1		
Placer Cty, C	Soil Remediation	30	0	30		
San Joaquir	Auto Refinishing	570	0	570	570	100
San Joaquir	Gasoline Dispensing (420 facilities subject to training to 263 per)	420	0	420	420	100
San Joaquir	Dry Cleaners		156	156	200	78
San Joaquir	Abrasive Blasting	330	0	330		
San Joaquir	Portable Equipment	150	0	150		
San Joaquir	Adhesives	187	0	187		
San Joaquir	Self Audits	86	0	86	7,000	1
San Joaquir	Abrasive Blasting	14		14		0.78
San Joaquir	Agricultural Related Business	84		84		4.69
San Joaquir	Aggregate Plants	28	2	30		1.67
San Joaquir	Asphalt Batch Plants	7		7		0.39
San Joaquir	Automotive Refinishing	71	7	78		4.35
San Joaquir	Can & Coil	5		5		0.28
San Joaquir	Chrome Platers	12		12		0.67
San Joaquir	Consultants	162		162		9.04
San Joaquir	Cotton Gins	4		4		0.22
San Joaquir	Concrete Batch Plants	30	3	33		1.84
San Joaquir	Dry Cleaners	21	1	22		1.23
San Joaquir	Feed Processing	16		16		0.89
San Joaquir	Food Processing	138	2	140		7.81
San Joaquir	Gasoline Dispensing Facilities	229		229		12.78
San Joaquir	Graphic Arts	37	5	42		2.34
San Joaquir	Hospitals	29		29		1.62
San Joaquir	Metal Parts Refinishing	44	2	46		2.57
San Joaquir	Misc.	199		199		11.10
San Joaquir	Oil Production	127	4	131		7.31
San Joaquir	Government Agencies, Other	200		200		11.18
San Joaquir	Paper Packaging (food, misc.)	38		38		2.12
San Joaquir	Polyester/Resin Operations	14		14		0.78
San Joaquir	Portable Equipment (registration certificates)	39		39		2.18
San Joaquir	Refineries	9		9		0.50
San Joaquir	Small Manufacturers (misc.)	82		82		4.58
San Joaquir	Soil Remediation Projects	84		84		3.57
San Joaquir	Water District	21	1	22		1.23
San Joaquir	Wood Coating & Woodworking	38	3	41		2.29
Santa Barba	Oil & Gas (onshore)	9		9	64	14
Santa Barba	Solvents (general)	24		24	38	63
Santa Barba	Gas Stations	6		6	224	3
Santa Barba	Auto Body Shops	4		4	70	6
Santa Barba	IC Engines	7		7	41	17
Santa Barba	Dry Cleaners	3		3	34	9
Santa Barba	Sand, Rock, & Gravel	2		2	9	22
Santa Barba	Incinerator	1		1	9	11
Santa Barba	Contaminated Soil	2		2	69	3
Santa Barba	Misc. Unpermitted	20		20		
Santa Barba	General Public	78		78		
Santa Barba	Government	19		19		
Santa Barba	Consultants	34		34		
Santa Barba	Asbestos	4		4		
Santa Barba	Media	1		1		
Santa Barba	Smoking Vehicles	9		9		
South Coast	All Small Businesses	3737	339	4076	~ 30000	13.6

APPENDIX E-4
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1996 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/C
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
South Coast	Auto Body	834	85	1019		
South Coast	Dry Cleaners	167	14	201		
South Coast	Restaurants	374	34	408		
South Coast	Wood Finishers	561	51	612		
South Coast	Metal Finishers	167	17	204		
South Coast	Electronics	167	17	204		
South Coast	Auto Repairs	561	51	612		
South Coast	Service Stations	561	51	612		
South Coast	Printing, Screen	83	9	102		
South Coast	Printing, Lithographic	82	10	102		
CO	Dry Cleaners	900	25	900	900	100
CO	Automotive Industry	450	8	458	800	57
CO	Printers	25	5	30	1500	2
CO	Metal Finishers	90	5	95	350	27
CT	Gas Stations	150	0	150	2000	8
CT	Dry Cleaners	50		50	735	8
CT	Auto Body Shops	250	450	700	1500	47
CT	Metal Finishers	250	25	275	500	55
CT	Printers	100	0	100	500	20
CT	Misc.	550	15	565	2500	23
DE	Dry Cleaners	82	3	85	120	71
DE	Motor Vehicle Refinishers	78	1	79	78	100
DE	Chrome Platers	5	0	5	5	100
DE	Agricultural Crop Producers	150	0	150	N/A	
DC	Dry Cleaners	90	0	90	150	60
FL	Dry Cleaners	64	1	65		
FL	Service Stations	1		1		
FL	Bulk Petroleum Plants	1		1		
FL	Machinery Shops	1		1		
FL	Boat Building	1		1		
FL	Auto Repair Shops	15		15		
FL	Wood Shops	1		1		
FL	Nursing Homes	1		1		
FL	Home Health Care	1		1		
FL	Consultants, Environmental	11		11		
FL	Environmental Labs	1		1		
FL	Business Organizations	2		2		
FL	Chrome Plating	2		2		
FL	Concrete Manufacturing	2		2		
FL	Asphalt Paving	1		1		
FL	Poly Cast Fabricators	3		3		
FL	Printers	2		2		
FL	A/C Contractor	1		1		
GA	Dry Cleaners	384	15	379	681	57
GA	Chrome Platers	5	0	5	15	33
GA	Degreasers	3	0	3	11	27
GA	Printers	69	2	71	1200	6
GA	Wood Furniture Manufacturers	66	2	70	700	10
HI	Dry Cleaners	5		5	37	13.5
ID	No response					
IL	Printers		0			
IL	Auto Body		0			
IL	Heating & Air Conditioning		0			
IL	Refrigeration Repair		0			
IL	Electroplating		0			
IL	Metal Fabricators		0			
IL	Consultants		0			
IL	Sign Shops		0			
IL	Aluminum Sand Casting		0			
IL	Lubricant Manufacturing		0			
IL	Aluminum Extrusion		0			
IL	Welding Shop		0			
IN	Dry Cleaners		45	350	350	100
IN	Dry Cleaners - General	450				

APPENDIX E-4
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1996 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/E
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
IN	Dry Cleaners - Workshops	80				
IN	Dry Cleaners - Mass Mail	1050				
IN	Auto Body	338	364	287	309 (4 cty ar	93
IN	Degreasers	40	0	40	108	38
IN	Electroplaters	38	0	38	81	47
IN	HVAC	500	0	500	500	100
IN	TPI (assistance by project)	480	2	482	800	50
IN	Boilers (assistance by project)	1028	0	158	unknown	
IA*	Dry Cleaners	200	15	215	275	78
IA	Grain Facilities	100	10	110	1500	7
IA	Auto Body Repair	600	50	650	1200	54.2
IA	Printers	10	5	15	700	2.1
IA	Manufacturing	100	25	125	2500	5
IA	Others	50	20	70	2000	3.5
KS	Agricultural Production & Services	5		5		
KS	Highway & Street Construction	1		1		
KS	Food & Kindred Products	8		8		
KS	Lumber & Wood Products Except Furnitur	13		13		
KS	Furniture/Fixtures	2	1	3		
KS	Printing, Publishing, & Allied Industries	28	2	28		
KS	Chemicals & Allied Products	5		5		
KS	Rubber & Misc.	5	1	6		
KS	Stone, Glass, & Clay	1		1		
KS	Primary Metals Industry	2		2		
KS	Fabricated Metal Products Except Machin	43	7	50		
KS	Industrial & Commercial Machinery & Con	29	9	38		
KS	Electronics	1		1		
KS	Transportation Equipment	10	3	13		
KS	Railroad Transportation	2	5	7		
KS	Air Transportation	4		4		
KS	Electric, Gas, & Sanitary Sewer	4		4		
KS	Wholesale Trade - Durable Goods	3		3		
KS	Personal Services	11	2	13		
KS	Automotive Repair	14	7	21		
KS	Repair, Misc.	3		3		
KS	Health Services	3		3		
KS	Educational Services	7		7		
KS	Membership Organizations	4		4		
KS	Engineering, Accounting, Research, & Arc	30		30		
KS	Private Households	9		9		
KS	Others Not Classified	70		70		
KS	Flower Shops	2		2		
KS	Veterinarians	1		1		
KS	Oil/Gas Field Services	1		1		
KS	Misc. Specialty Trade	1		1		
KS	Misc. Textiles	1		1		
KS	Misc. Apparel	1		1		
KS	Misc. Wood Products	1		1		
KS	Paperboard Containers	1		1		
KS	Paints & Allied Products	1		1		
KS	Chemicals, Misc.	1		1		
KS	Metal Cans/Ship	2		2		
KS	General Industrial Machines	6		6		
KS	Electric Wiring	2		2		
KS	Motor Vehicles	1		1		
KS	Consultants	24		24		
KY	Bit. Coal & Lig. Surface		2	2	0	
KY	Crushed & Broken Limestone		2	2	0	
KY	Food & Kindred Products, Misc.		1	1	20	5
KY	Textile Finishing, Except Wool	*	*		*	*
KY	Sawmills & Planing Mills	1	3	4	143	3
KY	Millwork, Plywood, & Structural		2	2	57	4
KY	Wood Products, Misc.		2	2	25	8
KY	Household Furniture		2	2	28	7
KY	Paperboard Containers & Boxes	1		1	19	5
KY	Printing, Commercial		1	1	130	1
KY	Paints & Allied Products		1	1	10	10
KY	Chemicals, Industrial Organic		1	1	7	14
KY	Chemical, Agricultural		1	1	28	4
KY	Chemical Products, Misc.		2	2	9	22
KY	Petroleum Refining		2	2	5	40

APPENDIX E-4
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STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/L
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
KY	Asphalt Paving & Roofing Material		3	3	39	8
KY	Plastic Products, Misc.		4	4	98	4
KY	Structural Clay Products		2	2	9	22
KY	Concrete, Gypsum & Plaster Products		1	1	150	1
KY	Nonmetallic Minerals, Misc.		1	1	7	14
KY	Secondary Nonferrous Minerals	1		1	4	25
KY	Nonferrous Rolling & Drawing		2	2	14	14
KY	Nonferrous Foundries	1		1	4	25
KY	Castings					
KY	Primary Metal Products, Misc.		1	1	8	13
KY	Fabricated Structural Metal Products		1	1	8	13
KY	Metal Services, NEC	1	1	2	20	10
KY	Fabricated Metal Products, Misc.		2	2	62	3
KY	Construction & Related Machines	1	3	4	34	11
KY	Special Industrial Machines		1	1	38	3
KY	General Industrial Machines		1	1	40	3
KY	Industrial Machines, NEC		1	1	8	13
KY	Motor Vehicles & Equipment		1	1	4	25
KY	Ship & Boat Building & Repair	1		1	N/A	
KY	Mess. & Cont. Devices		1	1	N/A	
KY	Sanitary Services	2		2	N/A	
KY	Farm Products Raw Materials		1	1	N/A	
KY	Laundry, Cleaning, & Garment Services		2	2	N/A	
KY	Membership Organizations	1		1	N/A	
KY	Engineering & Architectural Services	1		1	N/A	
Jeff Cty, KY	Autobody Shops	14	10	24	230	10
Jeff Cty, KY	Printers	24	16	40	228	9
Jeff Cty, KY	Dry Cleaners	14	3	17	175	10
Jeff Cty, KY	Misc. (mostly Costers)	414	47	461	925	50
LA*	Dry Cleaners		8	5	714	0.8
LA	Crop Preparation		2	2	2	100
LA	Veterinary Services		3	3	3	100
LA	Crude Petroleum		12	12	12	100
LA	Trade Contractor		1	1	1	100
LA	Terrazzo, Tile, Etc.		2	2	2	100
LA	Oil & Gas Service		4	4	57	7
LA	Heavy Construction		1	1	1	100
LA	General Contracting Ind.		1	1	1	100
LA	Asphalt Paving		1	1	9	11
LA	Printing, Commercial		2	2	52	4
LA	Table Oils, Etc.		1	1	3	33.3
LA	Chemicals		1	1	13	8
LA	Plastic Plumbing Fixtures		9	9	9	100
LA	Plastic Products, NEC		30	30	36	80
LA	Concrete Block		1	1	2	50
LA	Concrete Products		4	4	34	12
LA	Concrete, Ready Mix		8	8	56	14
LA	Fabricated Rubber		3	3	10	30
LA	Fabricated Wire		1	1	8	13
LA	Fabricated Metal Products		6	6	12	50
LA	Metal Doors, Etc.		2	2	27	7
LA	Aircraft		1	1	2	50
LA	Electroplating		8	8	15	53
LA	Fabricated Structures		6	6	43	14
LA	Shipbuilding		10	10	22	45
LA	Boatbuilding		13	13	64	20
LA	Fabricated Steel Plate		2	2	24	8
LA	Coating/Engraving		14	14	30	47
LA	Brick, Tile		2	2	4	50
LA	Aluminum Foundry		3	3	3	100
LA	Farm Machinery		1	1	12	8
LA	Ordnance		1	1	1	100
LA	Refuse Systems		2	2	2	100
LA	Scrap Material		1	1	1	100
LA	Chemicals, Etc.		2	2	3	67
LA	Bulk Stations		17	17	27	83
LA	Autobody Shops		3	3	775	0.4
LA	Auto Repair		2	2	5	40
LA	Repair Shops		2	2	6	33
LA	Prepack Software		6	6	6	100
LA	Laundry, Coin Op		1	1	1	100
LA	Engineering		3	3	3	100

APPENDIX E-4
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STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/C
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
LA	Minerals		1	1	1	100
LA	Prepared Food		1	1	1	100
LA	Paint Store		2	2	2	100
LA	Water Transportation		1	1	1	100
LA	Leather		1	1	1	100
ME	Veterinary Incinerators	33	0	33	33	100
ME	Auto Body Shops	181	1	182	303	60
ME	Sawmills	122	0	122	122	100
ME	Rock Crushers	11	0	11	43	25
ME	Dry Cleaners	1	1	2	83	2
ME	Litho Printers	2	6	8	250	3
MD	Auto Body	35	0	35	1000	3.5
MD	Automotive M&R	33	0	33	2000	3.3
MD	Aggregate	2	0	2	500	1
MD	Agriculture	2	0	2	1000	2
MD	Chrome Plating	15	2	17	30	50
MD	Contractor	15	0	15	2000	1
MD	Degreaser	3	0	3	10000	0.13
MD	Dry Cleaner	600	2	602	800	75
MD	Furniture Refinishing	3	0	5	500	0.6
MD	Gas Station	35	0	35	5000	0.7
MD	Small Manufacturer	3	1	3	500	0.6
MD	Metal Coating	5	0	5	500	1
MD	Race Track	1	0	1	100	1
MD	Poultry Operation	1	0	1	25	4
MD	Restaurant	3	0	5	500	1
MD	Recycler	1	1	2	100	1
MD	Paint Vendor	2	0	2	25	8
MD	Solvent Vendor	2	0	2	2	100
MA	Printers	600	11	611	1600	38
MA	Dry Cleaners	1300		1300	1300	100
MA	Wood Furniture	300	2	302	500	60
MA	Metal Working	11	10	21	1500	1.5
MA	Metal Platers	5	4	9	500	1.5
MA	Jewelry Manufacturing	2	2	4	90	4.4
MA	Tool & Die	7	6	13	150	8.6
MA	Auto Body	2400	3	2403	3600	66
MA	Optical	2	2	4	50	8
MA	Medical Instruments	2	2	4	60	6.6
MA	Other Trades, Unspecified	261	59	340	22150	1.5
MI	Consultants/Attorneys	275		275		
MI	Manufacturers	211		240		
MI	Services	57		57		
MI	Trade Associations	16		16		
MI	Public Agency	61		61		
MI	Other	21		21		
MN	Does not operate any follow up.					
MO	Cash Grains	11		11		
MO	Poultry and Eggs	6		6		
MO	Crop Services	18	2	20		
MO	Crushed & Broken Limestone	61	16	77		
MO	Nonmetallic Minerals Services	8		8		
MO	Construction, Residential	6		6		
MO	Construction, Nonresidential	1		1		
MO	Construction, Highway and Street	6		6		
MO	Construction, Heavy Except Highway	12		12		
MO	Contractors, Misc. Special Trade	8		8		
MO	Meat Products	9		9		
MO	Preserved Fruits and Vegetables	1		1		
MO	Grain Mill Products	8		8		
MO	Fats and Oils	9	2	11		
MO	Beverages	6		6		
MO	Broadwoven Fabric Mills, Wool		1	1		
MO	Misc. Fabricated Textile Products		1	1		
MO	Logging	4	1	5		
MO	Sawmills & Planing Mills	24		24		
MO	Millwork, Plywood & Structural	14	1	15		
MO	Wood Containers	11		11		

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		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
MO	Wood Products, Misc.	33	2	35		
MO	Household Furniture	11		11		
MO	Partitions & Fixtures	11		11		
MO	Newspapers	9	1	10		
MO	Printing, Commercial	48	14	62		
MO	Chemicals, Industrial Inorganic	12		12		
MO	Plastics Materials & Synthetics	5		5		
MO	Drugs	6		6		
MO	Soap, Cleaners, & Toilet Goods	9		9		
MO	Paints & Allied Products	40		40		
MO	Chemicals, Industrial Organic	28	1	29		
MO	Chemicals, Agricultural	3	4	7		
MO	Chemical Products, Misc.	43		43		
MO	Hose & Belting & Gaskets & Packing	6		6		
MO	Fabricated Rubber Products, NEC	8		8		
MO	Plastic Products, Misc.	13		13		
MO	Handbags & Personal Leather Goods	3	1	4		
MO	Structural Clay Products	5		5		
MO	Concrete, Gypsum, & Plaster Products	18	1	19		
MO	Nonmetallic Minerals, Misc.	1		1		
MO	Blast Furnace & Basic Steel Products	7		7		
MO	Iron & Steel Foundries	1		1		
MO	Secondary Nonferrous Metals	9		9		
MO	Nonferrous Foundries (Castings)	5		5		
MO	Metal Cans & Shipping Containers	6		6		
MO	Cutlery, Handtools, & Hardware	5		5		
MO	Fabricated Structural Metal Products	1		1		
MO	Screw Machine Products, Bolts, etc.	1		1		
MO	Metal Forgings & Stampings	10	3	13		
MO	Metal Services, NEC	9	2	11		
MO	Construction & Related Machinery	10	2	12		
MO	Special Industry Machinery	8	2	10		
MO	General Industry Machinery	11		11		
MO	Industrial Machinery, NEC	13		13		
MO	Electrical Industrial Apparatus	22		22		
MO	Household Appliances	6		6		
MO	Electrical Lighting & Wiring Equipment	4		4		
MO	Electronic Components & Accessories	6		6		
MO	Electrical Equipment, Misc.	6		6		
MO	Motor Vehicles & Equipment	14		14		
MO	Aircraft & Parts	12		12		
MO	Transportation Equipment, Misc.	6	1	7		
MO	Public Warehousing & Storage	10	4	14		
MO	Airports, Flying Fields, & Services	12		12		
MO	Pipelines, Except Natural Gas	6		6		
MO	Telephone Communications	5		5		
MO	Electric Services	35		35		
MO	Combination Utility Services	8		8		
MO	Water Supply	6		6		
MO	Sanitary Services	51	1	52		
MO	Motor Vehicles, Parts & Supplies	6		6		
MO	Lumber & Construction Materials	12		12		
MO	Metals and Minerals, Except Petroleum	6		6		
MO	Electrical Goods	6		6		
MO	Farm - Product Raw Materials	18		18		
MO	Nondurable Goods, Misc.	9	1	10		
MO	Grocery Stores	21		21		
MO	Gasoline Service Stations	38	5	43		
MO	Furniture & Home Furnishings Storage	6		6		
MO	Fuel Dealers	41	3	44		
MO	Retail Stores, NEC	1		1		
MO	Laundry, Cleaning, & Garment Services	71	6	77		
MO	Personal Services, Misc.	5		5		
MO	Business Services, Misc.	10	1	11		
MO	Automotive Repair Shops	7	1	8		
MO	Hospitals	27	1	28		
MO	Elementary & Secondary Schools	11		11		
MO	Business Associations	14	1	15		
MO	Civic & Social Associations	5		5		
MO	Engineering & Architectural Services	708	5	713		
MO	Research & Testing Services	19		19		
MO	Private Households	6		6		
MS	Auto Body Shops	180	20	180	600	30

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STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/E
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
MS	Dry Cleaners	87	9	96	395	24
MT	Auto Repair Shops	343	7	350	>800	58
MT	Service Stations	25	3	28	>300	10
MT	Auto Dealers	75	17	92	>200	48
MT	Furniture Dealers	92	1	93	162	57
MT	Dry Cleaners	84	12	96	96	100
MT	Small Manufacturing	23	18	39	>1000	4
MT	Chromium Electroplating	0	5	5	8	63
MT	Printers	24	0	24	112	21
MT	Educational Institutions	8	1	7	>40	18
MT	Gas Distribution	5	0	5	>40	13
MT	Bakery (only 1 subject to Title V)	1	0	1	1	100
MT	Publishers	3	0	3	>15	20
NE	Dry Cleaners	12	4	16	238	7
NE	Auto Body Painting	15	3	18	627	3
NE	Sand & Gravel	10	3	13	173	7
NE	Concrete Batch Mix	15	5	20	206	10
NE	Fabricated Metal Products	16	11	27	125	22
NE	Printing Trade	24	3	27	362	7
NE	Plastics & Synthetics	8	4	12	unknown	5
NE	Chemical & Fertilizer Product	5	2	7	245	3
NE	Food Processing	19	2	21	83	25
NE	Grain Elevators	8	1	7	450	2
NE	Electroplating	4	2	6	21	29
NE	Sawmills	3	1	4	14	29
NE	Wood Products	2	1	3	129	2
NV	Mining/Milling--Metal	3		3		
NV	Military	1		1		
NV	Realty	3		3		
NV	Government	10		10		
NV	Plastics	1		1		
NV	Gas Stations	8		8		
NV	Engineer/Consultant	7		7		
NV	Citizen	37		37		
NV	Oil Company	2		2		
NV	Newspaper	1		1		
NV	Laboratory	3		3		
NV	Casino	1		1		
NV	Construction	41		41		
NV	Auto	7		7		
NV	Agriculture/Ranch	2		2		
NV	Asbestos	23		23		
NV	Unknown	420		420		
NH	Not yet tracked.					
NJ	Data not available.					
NM	Sand & Gravel	6	2	8	N/A	N/A
NM	Concrete Batch	1	0	1	N/A	N/A
NM	Dry Cleaners	11	3	14	N/A	N/A
NM	Oil & Gas	3	1	4	N/A	N/A
NM	Manufacturing, Tank	1	0	1	N/A	N/A
NM	Manufacturing, General	5	1	6	N/A	N/A
NM	Manufacturing, Wood	354	0	354	N/A	N/A
NM	Electronics	1	1	2	N/A	N/A
NM	Construction	2	1	3	N/A	N/A
NM	Foundries	1	1	2	N/A	N/A
NY	Apartment Houses	3		3		
NY	Automotive/Auto Body	19		19	3834	0.48
NY	Bakery/Food Processor	67		67		
NY	Chemical/Plastics	7		7	675	1.04
NY	Consultants/Attorneys/Vendors	184		184		
NY	Construction/Contractor	7		7		
NY	Crematory	1		1		
NY	Dry Cleaners	26		26	3538	0.79
NY	Electronic Products	5		5	596	0.84
NY	Environmental Equipment	4		4		
NY	Fuel Dispensing/Bulk Storage	13		13	4477	0.29
NY	Graphic Arts	30	1	31	3824	0.81

APPENDIX E-4
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1996 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/C
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
NY	Gravel Pits/Asphalt/Concrete	8		8	781	1.05
NY	HVAC/Plumbing	48		48		
NY	Hospitals/Nursing Homes	4		4		
NY	Machine Shop	1		1		
NY	Manufacturers	35	8	41	2077	1.97
NY	Metal Finishers	14		14	1801	0.78
NY	Metal Platers	19		19	203	9.38
NY	Misc.	64		64		
NY	Paint Manufacturer	6		6		
NY	School	2		2		
NY	Small Business Support Groups, Chambe	147		147		
NY	Surface Coaters	82	4	86	5000	1.72
NY	Utility/Combustion	22		22		
NC	Dry Cleaners	18	2	20	400	5
NC	Cotton Gins	4	1	45	45	100
NC	Plastic Molding	2	2	4	unknown	
NC	Uniform Service	2	1	3	unknown	
NC	Emergency Gens.	2	0	2	~ 100	2
NC	Electric Motor Repair	1	0	1	100	1
NC	Concrete, Ready Mix	3	2	4	unknown	
NC	Wood Furniture Industry	12	12	24	~ 500	5
NC	Sawmill/Lumber	2	2	4	~ 500	1
NC	Small Boat Manufacturing	1	2	3	100	3
NC	Metal Fabricators	12	2	14	unknown	
NC	Printers	2	2	4	unknown	
NC	Chemical Coatings	4	2	6	unknown	
NC	Fur Dressing	1	1	2	~ 5	20
NC	Chromium Electroplaters	2	0	2	~ 100	2
NC	Small Grain Elevators	2	3	5	~ 100	3
NC	Tire Cord Manufacturer	3	2	5	~ 50	10
NC	Asphalt Plants	3	1	4	~ 250	3
NC	Business, Misc.	13	1	14	unknown	
NC	Consultants	10	0	10	unknown	
NC	Individuals	44	0	44	unknown	
ND	Incinerator, Operators	43	0	43	43	100
ND	Chromium Electroplaters	3	0	3	3	100
ND	Wood Furniture Manufacturers (2 mailings)	100	0	100	50	100
OH	Auto Body Shops	22	14	36	N/A	
OH	Printing	139	14	153	2200	7
OH	Fabricated Metal Products	64	13	79	N/A	
OH	Rubber & Plastic Products	15	7	22	N/A	
OH	Wood Products	18	6	22	N/A	
OH	Metals, Primary	12	4	18	N/A	
OH	Stone Quarries	4	3	7	N/A	
OH	Chemical Manufacturers	14	3	17	N/A	
OH	Feed/Grain Elevators	21	3	24	N/A	
OH	Machinery Manufacturing, Misc.	34	4	38	N/A	
OH	Misc.		18		N/A	
OH	Schools	41	0	41	N/A	
OH	Consultants	18	0	18	N/A	
OH	Membership Organizations	19	0	19	N/A	
OH	Gas Stations	44	0	44	N/A	
OH	Churches	7	0	7	N/A	
OK	Oil & Gas; Misc. Petroleum	85	1	86	3400	2.5
OK	Wood Products, Furniture/Fixtures, Millwo	7	8	13	268	5
OK	Printing, Commercial	3	2	5	1115	1
OK	Structural Clay Products	2	0	2	20	10
OK	Fabricated Metal Products	50	0	50	486	10
OK	Fabricated Metal Products, Misc.	35	10	45	283	17
OK	Engines & Turbines	0	1	1	36	3
OK	Construction Machinery	0	1	1	280	1
OK	Electronic Components	0	3	3	75	4
OK	Trucking Terminals	1	0	1	2	50
OK	Gas Production/Distribution	45	0	45	383	12
OK	Automotive Dealers/Service Stations	10	0	10	3370	1
OK	Laundry	5	0	5	1341	1
OK	Automotive Repair Shop	5	5	10	5181	1
OK	Colleges, Universities, & Schools	22	2	24	744	3
OK	Tires & Innertubes	2	0	2	6	33
OK	Others Not Identified	~ 1100	0	1100	N/A	N/A

APPENDIX E-4
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1998 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/C
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
OR	Dry Cleaners	73	2	75	475	16
OR	Metal Painting	5	0	5	418	1
OR	Chrome Plating	10	0	10	150	7
OR	Freon Recycling	18	0	18	350	5
OR	Wood Coating	33	0	33	178	18
OR	Auto Repair	2	0	2	2183	insig.
OR	Construction	5	0	5	980	insig.
PA	Forestry	7	0	7	138	5
PA	Mining & Quarrying	8	0	8	425	1
PA	Construction, Heavy	11	0	11	2573	1
PA	Construction	8	0	8	12039	1
PA	Food & Kindred Products	30	1	31	998	3
PA	Textile Mill Manufacturing	5	0	5	364	1
PA	Lumber & Wood	5	0	5	1650	1
PA	Furniture Manufacturing	25	1	26	325	8
PA	Paper Manufacturing	13	0	13	575	2
PA	Printing & Publishing	39	0	39	4703	1
PA	Chemical Manufacturing	77	0	77	607	12
PA	Petroleum Refining	22	0	22	108	20
PA	Rubber & Plastic Manufacturing	18	0	18	805	2
PA	Leather Products	3	0	3	68	4
PA	Stone, Clay, Glass Manufacturing	28	0	28	914	3
PA	Metal Manufacturing, Primary	26	4	30	582	5
PA	Fabricated Metal Manufacturing	101	1	102	2108	5
PA	Industrial & Commercial Maching Manufar	51	1	52	3224	2
PA	Electronic Equipment Manufacturing	60	1	61	877	9
PA	Measuring & Analysis Instrument Manufac	12	0	12	258	5
PA	Misc. Manufacturing Industries	15	0	15	2087	1
PA	Electric, Gas, & Sanitary	34	0	34	1368	2
PA	Wholesale Trade	27	0	27		
PA	Auto Service Station	7	0	7	3545	1
PA	Real Estate	14	1	15		
PA	Personal Services	15	0	15	5712	1
PA	Auto Repair Services	67	0	67	23102	1
PA	Health Services	8	0	8	1412	1
PA	Coal Mining	2	0	2	170	1
PA	Oil & Gas Extraction	1	0	1	290	1
PA	Apparel Manufacturing	1	0	1		
PA	Agricultural Services	1	0	1	3220	1
PA	Transportation Equipment Manufacturing	1	0	1	286	1
PA	Local/Suburban Transit	1	0	1		
PA	Transportation By Air	1	0	1		
PA	Transportation Services	3	0	3		
PA	Legal Services	17	0	17		
PA	Educational Services	14	0	14		
PA	Membership Organizations	36	0	36		
PA	Engineering & Accounting Services	200	0	200		
PA	Administrative-Environmental Programs	238	0	238		
PA	Non-classifiable	98	0	98		
PR	Dry Cleaners	45	50	95	150	63
PR	Auto Shops	50	25	75	1500	5
PR	Woodworking Shops	35	45	80	450	17
RI	Wood Products	2	0	2	107	2
RI	Chrome Electroplaters	1	0	1	20	5
RI	Chemical Manufacturers	1	1	2	58	3
RI	Metal Finishing	15	10	25	313	8
RI	Textile	12	4	16	108	15
RI	Auto Body	28	40	68	400	17
RI	Marine	2	0	2	40	5
RI	Printing	2	1	3	60	5
RI	RI P2 Conference & Expo	700				
SC	Dry Cleaners	30	1	31		
SC	Consultants	24		24		
SC	Wood Products	12	5	17		
SC	Manufacturer	12	2	14		
SC	Government	12		12		
SC	Painting/Coating	18	3	19		
SC	Solid Waste Processing	7	2	9		
SC	Grain Facilities	5	1	6		

APPENDIX E-4
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1996 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/C
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
SC	Cotton Gins	4	2	6		
SC	Chemical	5		5		
SC	Textiles	5	2	7		
SC	Metal Finishing	8	2	10		
SC	Boat Manufacturer	3		3		
SC	Concrete Batch Plant	5		5		
SC	Foundry	2	1	3		
SC	Fiberglass/Marble	3	1	4		
SC	Construction	2		2		
SC	Printer	2		2		
SD	Municipal Waste Landfill	15	2	17	15	113
SD	Wood Furniture	45	0	45	45	100
SD	Gasoline Distribution	6	0	6	10	60
TN	Chrome Platers	25	1	26	66	39
TN	Dry Cleaners	100	1	101		
TN	Local Governments	28		28		
TN	Metal Stamping	12		12		
TN	Printing	500	31	531	3200	17
TN	Private/General	48	3	51	132	39
TN	Schools/Colleges	6		6		
TN	Government, State	32		32		
TN	Wood Manufacturing	480	20	480		
TN	Auto Services	23	14	37		
TN	Recyclers	31	15	46		
TN	Misc.		81	81		
TX	Thermoset	79	1	80	978	8
TX	Auto Repair	258	1	259	28214	1
TX	Dry Cleaners	255		255	2352	17
TX	Printers	338	1	339	8970	2
TX	Wood Products	1386	56	1442	1711	87
TX	Foundries (included in metal finishers)				200	
TX	Auto Body	245	26	271	5179	11
TX	Metal Finishers (includes foundries)	644		644	2782	34
TX	Manufacturing	517		517	15784	6
TX	Misc.	18077	11	18003		
UT	Wood Refinishers		2	348	230	150
UT	Wood Refinishers—mailings	254				
UT	Wood Refinishers—phone calls	48				
UT	Wood Refinishers—permitting	44				
UT	Printers		15	387	270	143
UT	Printers—mailings	280				
UT	Printers—phone calls	27				
UT	Printers—permitting	35				
UT	Printers—presentations	30				
UT	Auto Body Refinishing		1	41	400	10
UT	Auto Body Refinishing—phone calls	27				
UT	Auto Body Refinishing—permitting	13				
UT	Dry Cleaning		6	272	260	105
UT	Dry Cleaning—mailings	256				
UT	Dry Cleaning—phone calls	10				
UT	Aggregate/Concrete		9	62	200	41
UT	Aggregate/Concrete—phone calls	19				
UT	Aggregate/Concrete—permitting	4				
UT	Aggregate/Concrete—presentations	50				
UT	Chrome Platers		2	76	30	253
UT	Chrome Platers—mailings	56				
UT	Chrome Platers—phone calls	13				
UT	Chrome Platers—permitting	3				
UT	Manufacturers			374	5000	7.5
UT	Manufacturers—mailings	239				
UT	Manufacturers—phone calls	64				
UT	Manufacturers—permitting	1				
UT	Manufacturers—presentations	50				
UT	Ethylene Oxide					
UT	Ethylene Oxide—mailings	2		2	2	100
VT	No response					
VA	Dry Cleaners	560	0	629	750	83
VA	Dry Cleaners—direct compliance	69				

APPENDIX E-4
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1996 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/C
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
VA	Printers	45	0	50	350	13
VA	Printers - direct compliance	5				
VA	Wood Furniture Manufacturers	425	2	427	1257	34
VA	Wood Furniture - direct compliance	139				
VA	Structural Steel Fabrication	2	1	3	74	4
VA	Commercial Boiler	1		1	N/A	
VA	Service Stations	1		1	N/A	
VA	Ethylene Oxide Sterilizers	1		1	4	25
VA	Electroplaters	3		3	80	4
VA	Sawmills	2		2	138	1
VA	Plastics Unsupported Sheet	1		1	9	11
VA	Auto Body Shops	7		7	N/A	
VA	Charcoal Manufacturing	1		1	1	100
VA	Landfills	2		2	N/A	
VI	Dry Cleaners	18	0	18	18	100
VI	Printers	15	8	10	40	25
VI	Air Condition	5	5	10	84	12
VI	Auto Garage & Repair Shops	10	10	20	205	10
WA (Ecolog.	Dry Cleaners	900	2	902	900	100
WA (BCCAA	Dry Cleaners	2	5	7		
WA (BCCAA	Cabinet Shops	1	5	6		
WA (BCCAA	Auto Body Shops	1	8	9		
WA (SCAPC	Dry Cleaners			40		
WA (SCAPC	Surface Coating			170		
WA (SCAPC	Chrome Plating			7		
WA (SCAPC	Graphic Arts & Litho Printing			50		
WA (YRRC	Dry Cleaners	39	4	43	16	
WA (YRRC	Fiberglass				5	
WA (YRRC	Printers	5		5	18	
WA (YRRC	Gas Stations	102	12	114	73	
WA (YRRC	Feedlots	5	2	3		
WA (YRRC	Dairies	3	2	2		
WA (YRRC	Sand/Gravel	6	3	4		
WA (YRRC	Construction	152	115	267		
WA (YRRC	Agricultural	50	11	61		
WA (YRRC	Wood Products	6	3	5		
WA (YRRC	Spray Booths	4	2	6		
WV	Asphalt	5		5	40	12
WV	Automotive	7		7	N/A	
WV	Coal Preparation	4		4	250	2
WV	Concrete	9	3	12	N/A	
WV	Consulting	10		10	N/A	
WV	Dry Cleaning	54	10	64	80	81
WV	Electroplating	41	6	10	20	50
WV	Gasoline Distribution	2		2	N/A	
WV	HVAC	5		5	N/A	
WV	Manufacturing	48	13	32	N/A	
WV	Metal Finishing					
WV	Mineral Processing	22	4	26	50	52
WV	Misc.	41	4	45	N/A	
WV	Printing	3		3		
WV	Surface Coating	16	2	18		
WI*	Dry Cleaners	326	15	341	320	107
WI	Adhesives, Industrial	60	0	60	50	120
WI	Automotive Services	606	15	624	400	156
WI	Chromium Electroplaters	119	0	119	120	99
WI	Aerospace	21	0	21	150	14
WI	Rock Crushers	87	0	87	300	29
WI	Wood Finishers	223	2	225	425	53
WI	Printers	235	4	239	420	56
WY	Chrome Platers	6	0	6	5	125
WY	Dry Cleaners	2	1	3	40	8
WY	Auto/Truck Maintenance/Painting	164	0	164	unknown	
WY	Auto Wrecking	1	0	1	~28	
WY	Wood Manufacturing	72	0	72	unknown	
WY	Newspaper Publishing	1	0	1	unknown	
WY	Trona Process	5	0	5	5	100
WY	Government/Federal Facilities	1	0	1	unknown	
WY	Electric Utilities	1	0	1	7	18

APPENDIX E-4
SUMMARY OF INDUSTRY SECTORS RECEIVING ASSISTANCE, BY PROGRAM
(DATA FROM 1996 SECTION 507 REPORT)

STATE	INDUSTRY SECTOR	NUMBER OF ASSISTANCES			NUMBER OF ELIGIBLE FACILITIES (C)	% OF TOTAL ELIGIBLE FACILITIES (A+B)*100/L
		GENERAL (A)	ON-SITE (B)	TOTAL (A+B)		
WY	Oil Refining	1	0	1	4	25
WY	Coal Mining	1	0	1	23	4
WY	Contractor, General	1	0	1	unknown	
WY	General Business	250	0	250	unknown	
TOTALS		65669	3833			

**TABLE E-5
SBO OUTREACH ACTIVITIES**

Program	Number of Services Provided / Number of Businesses or Individuals Reached																	
	Meetings		Speaking Events		Personal / Technical Assistance (inc. hotline and mailings)		Media Coverage		Information Booths Trade Shows Conferences		Newsletters		Brochures/ Flyers		Training Sessions		Other	
Alabama	1	20	14	681											9	20		
Alaska*	9	105	24	1,723					2	600			12	3,845	10	232		
Arizona	17	82	32	1,200									8	10,000	7	300	45*	45
Maricopa Cty	20	50	6	120									3	800	3	200		
Pima Cty	N/R																	
Arkansas	Yes		3	200	2	2									18	415		
California	100 +	1,000 +	Dozens	Hundreds									40 +	Thousands	9 +	Hundreds		
SCAQMD	178	Unknown	88	2,640					117	Unknown			5,467	5,467	131	Unknown		
Colorado	7	49	3	35	7	132							2	700	11	138	14* 15	35 35
Connecticut	25	1,100	25	1,300									15	10,000	25	1,000		
Delaware	Many	Not sure	3	150									4	500				
District of Columbia*	None																	
Florida	Yes*		Yes*										Yes*		2	40		
Georgia	11	~100	12	500									12	500	6	350		
Hawaii	N/A																	
Idaho	4	N/A											2	2,000	1	50		
Illinois	30	100	10	200	Yes	N/A							30	10,000				
Indiana	40	150	2	300														
Iowa	20	~300	6	112			1	N/A					2	203,000	1	30	3*	24
Kansas	26	500	4	50							4	2,100 quarterly	2	1,000	1	225	1* 1* 1*	2,000 3,000 150
Kentucky	13	723	12	410	42	42	6	87,900					1	2,000	10	1,625		

**TABLE E-5
(Continued)**

Program	Number of Services Provided / Number of Businesses or Individuals Reached																	
	Meetings		Speaking Events		Personal / Technical Assistance (In-person and mailings)		Media Coverage		Information Booths Trade Shows Conferences		Newsletters		Brochures/Flyers		Training Sessions		Other	
Jefferson County	2	32	7	175									3	2,430	4	80	3'	16,000
Louisiana	None		None				Yes	?					None		None			
Maine	3	1,384	14	1,231														
Maryland	None		None										None		None		None	
Massachusetts	None																	
Michigan *	12	200	6	150														
Minnesota	20	500	4	200									4	500	2	50		
Mississippi	5	8,380	9	450							12	3,326 / month	12	50,000	13	520	6*	90
Missouri	None		None										None		None			
Montana	36	500	6	260									14	632	3	50	62 ²	75 ²
Nebraska	54	1,340	20	732					2	Unknown			3	3,350	21	724		
Nevada	16	261	Yes	305					Yes	75			2	50	Yes	20		
New Hampshire	7	91	9	563							1	3,000	1	300	1	24		
New Jersey	4	20	1	30													6'	60
New Mexico	3	60	5	100									0	0	0	0	0	0
New York	48*		27	1,239									7	89,000			27 ¹	1,030 ³⁵
North Carolina	14	2,000	10	300									4	500	8	600		
North Dakota	Yes		No										Yes		No		Note *	
Ohio	79	475	4	125	280	250 +							3,500	3,500 +	4	125	15 ⁺ 300 +	15 250 +
Oklahoma	Combined w/SBAP																	
Oregon	None																	
Pennsylvania	None *																	

TABLE E-5
(Continued)

Program	Number of Services Provided / Number of Businesses or Individuals Reached																	
	Meetings		Speaking Events		Personal / Technical Assistance (inc. hotline and mailings)		Media Coverage		Information Booths Trade Shows Conferences		Newsletters		Brochures/Flyers		Training Sessions		Other	
Puerto Rico	None																	
Rhode Island	70	200	1	75	250	250									Yes			
South Carolina	40	100	8	150							4	3,000	3	1,500	1	30		
South Dakota					17	17							100	100			28* 25*	28 25
Tennessee	105	280	25	1,215					5	500			7	4,081	63	750		
Texas	26	625	25	861	37,328	37,328	4+	14,000+	3	250	Included in Table E-8: Fact sheets, Manuals, & Info Packets		16 titles	23,800 dist.	48	1,347	3*	142
Utah	139	850	10	600			2	18,000	4	1,000	1	3,500		5,500	6	400		
Vermont	None		None										None		None			
Virginia	31	?	5	1,000									6	1,600	2	90	3* 1	425 + 7
Virgin Islands	None		None										None		None			
Washington	N/R																	
West Virginia	16	N/A	4	220	60	250							16	600	2	70	3* 6*	20 500
Wisconsin	25	65			125	125												
Wyoming	3	12	3	N/A									1	N/A			1*	1 (SBO)
TOTAL*	1,459	21,634	447	19,652	38,104	38,396	11	119,900	133	2,425	22	14,926	9,292*	437,255	422	9,505	570	23,985

Totals do not reflect answers such as, "yes." Figures such as 500+ are tallied as 500.

***Notes:**

AK SBTCP database was not in use until July 1, 1996. Therefore, the numbers listed are only for a 6 month period.

AZ Permit application assistance.

CO Small Business Environmental Fax Network: 14 fax alerts were sent on topics related to environmental issues such as state legislation, rule-making hearings, task force work groups, and other small business issues. Information sent to 35 member network, of which 17 are trade group representatives.
State Legislation Outreach: Tracked 15 bills on environmental legislation. Related information to businesses and trade groups through the Small Business Environmental Fax Network. Information sent to 35 member Fax Network.

TABLE E-5
(Continued)

DC	None. SBO position vacant for most of reporting period.
FL	Ombudsman's office is combined with the SBAP.
IA	3 focus groups.
KS	1 permit guidance document. 1 service guide. 1 community regulatory guidebook (only recently printed).
MI	SBO position vacant from June through August 1996.
MS	6 teleconferences.
MT	62 site visits and 2 permitting guidance.
ND	The Governor's Office and the SBDC regional offices received copies of the "Environmental Self-Evaluation Guide" developed by the SBO and SBAP. An unrecorded number of guides were sent out upon request to businesses. An unrecorded number of mailings of pollution prevention information were made to businesses. An unrecorded number of referrals were made to regional SBDCs.
NJ	6 task forces.
NY	Meetings attended, but did not give presentations. 27 support group meetings/seminars and 1 teleconference.
OH	15 trade association membership outreach manuals and 300 printing industry environmental manuals.
PA	Ombudsman position vacant as of April 1996. Information unavailable.
SD	26 telephone/fax/e-mail contacts from other state SBOs and SBAPs. 25 internal contacts with SBAP.
TX	3 video teleconference.
VA	1 fact sheet for wood furniture manufacturers and 2 fact sheets for RACT printing regulations. Participated in state regulatory development for NSR, State Operating Permits, PTE Exclusionary Rule, federal regulatory development SBREFA process for PTE.
WV	3 Panel Secretariat. 6 professional/trade organization.
WY	Visit to Colorado CAP (training).

Brochures/Flyers Total: SCAQMD, CA and Ohio both apparently reported the number of brochures/flyers distributed rather than the number of titles developed; therefore, this number is high.

**TABLE E-6
SBO TOLL-FREE HOTLINE INFORMATION**

PROGRAM	NATIONAL	IN-STATE ONLY
Alabama	800-533-2336	
Alaska		800-510-2332
Arizona		800-234-5677, x4337
Maricopa County	None	
Pima County	None	
Arkansas	None	
California		800-ARB-HLP2
SCAQMD		800-388-2121
Colorado	800-333-7798	
Connecticut	None	
Delaware		800-789-4599
District of Columbia		645-6093, x3082
Florida		800-722-7459
Georgia	None	
Hawaii	None	
Idaho	None	
Illinois		800-EPA-1996
Indiana		800-451-6027, x2-8598
Iowa		800-351-4668
Kansas	800-357-6087	
Kentucky	800-926-8111	
Jefferson County	None	
Louisiana		800-256-1488*
Maine		800-789-9802
Maryland	800-433-1247	
Massachusetts	None	
Michigan	None	
Minnesota		800-985-4247

TABLE E-6
(Continued)

PROGRAM	NATIONAL	IN-STATE ONLY
Mississippi		800-725-6112
Missouri	None	
Montana	800-433-8773	
Nebraska	None	
Nevada		800-992-0900, x 4670
New Hampshire		800-837-0656
New Jersey	800-643-6090	
New Mexico	800-810-7227	
New York	800-STATE-NY (800-782-8369)	
North Carolina	800-829-4841	
North Dakota		800-755-1625
Ohio		800-225-5051
Oklahoma	800-869-1400	
Oregon		800-452-4011
Pennsylvania	None	
Puerto Rico	None	
Rhode Island		800-932-1000
South Carolina	800-819-9001	
South Dakota		800-GET-DENR
Tennessee	800-734-3619	
Texas	800-447-2827	
Utah	None	
Vermont	None	
Virginia		800-592-5482
Virgin Islands	None	
Washington	None	
West Virginia		800-982-2474

TABLE E-6
(Continued)

PROGRAM	NATIONAL	IN-STATE ONLY
Wisconsin	800-435-7287	
Wyoming	None	

***Notes:**

LA Closed November 1, 1996

**TABLE E-7
SBAP OUTREACH ACTIVITIES**

Program	Number of Services Provides / Number of Businesses or Individuals Reached																	
	General		On-Site Visits		Seminars, Workshops, Meetings, etc.		Fact Sheets, Manuals, Information Packets		Newsletters		Pollution Prevention Assistance		Permit and Compliance Assistance		Teleconferences		Other	
Alabama	Yes	1,200			30	1,400												
Alaska*	707	707	23	23	10*	232	12	3,845*										
Arizona	1,322	1,322	45	45	7	300	8	10,000										
Maricopa Cty	120	120	46	56	6	500	4	5,000										
Pima Cty	24	30	37	60	4	140	7	1,500+					7	15				
Arkansas	1	4	1	13	18	415												
California	780* Hundreds	780* Hundreds	Hundred s	Hundred s	Hundreds	1,000+	Hundre ds	Thousands									Hundre ds	Hundred s
SCAQMD	9,226	9,226	2,339	2,339	250	Unknown	2,861	2,861										
Colorado	500	500	22	22	24	350	3	1,500										
Connecticut	400	300	325	325	Combined w/SBO		15	5,000										
Delaware	Yes	30	6	N/A	No		Yes											
District of Columbia	20	20			3	200+	1	200+										
Florida	Yes	N/R	1	1	14	1,000	5,000	5,000							3	100		
Georgia	728	650	25	20	69	~1,000	7,530	7,000										
Hawaii	N/A																	
Idaho	130	130	8	8	4	?	3	?									1*	?
Illinois	4,293	4,293			40	2,310	110	6,603										
Indiana	2,497	2,254	413	365	5	2,148											2* 7,200* 1,318*	850 ? ?
Iowa	848	N/R	132	N/R	22	N/R	>4	N/R					192	N/R				
Kansas	244	244	38	38	31	1,000	11	1,400	4	7,000								
Kentucky	35	35	59	59	25	?	?	?										
Jefferson Cty	Yes		Yes		Yes										Yes			

**TABLE E-7
(Continued)**

Program	Number of Services Provided / Number of Businesses or Individuals Reached																
	General		On-Site Visits		Seminars, Workshops, Meetings, etc.		Fact Sheets, Manuals, Information Packets		Newsletters		Pollution Prevention Assistance		Permit and Compliance Assistance		Teleconferences		Other
Louisiana	742	742	207	207	39	750	4	200+	4	2,000+					2	180	1° 4° 3° N/A 681
Maine	164	164	12	12	13	3,279	6	761									
Maryland	Yes	1,200	8	8	7	600	800	1,500									
Massachusetts	210	210	7°	93	17	720	Yes	2,250									
Michigan	641°	641	29°	29	22° 2°	244 470	61 3	61 1,174							1	60	
Minnesota	2,685	N/R	76	76	71	Hundreds	5	N/R									
Mississippi	Yes	N/A	36	36	13	540	641°	641	12	3,326/ month					6	90	
Missouri	Yes		Yes		Yes		Yes		Yes				Yes				
Montana	N/R																
Nebraska	780	780	42	42	21	724											
Nevada	43	43	N/A	N/A	N/A	N/A	36	36									11° 11
New Hampshire	659	659	22	22	5	226	500	500			18	N/A			6	39	8° N/A
New Jersey	467	467	9	15	23	740	603	603+	1	120	2°	87	2° 4°	90 300			
New Mexico	200	200	25	25	14	280	110	450			5	40	30	30			
New York	N/A	421	N/A	11	24	918	3°	140/190/75	2	9,000							
North Carolina	220	220	36	36	8	600	4	100									
North Dakota	N/A	500-1,000	Yes	N/R	1	40	6	215									
Ohio	991	600	118	109	12	372	74	74	3	1,500			135	<135			19° 4° 7° 19 23,000 7
Oklahoma	1,100	1,100	26	26	12	200	2	20									7° 105

**TABLE E-7
(Continued)**

Program	Number of Services Provided / Number of Businesses or Individuals Reached																	
	General		On-Site Visits		Seminars, Workshops, Meetings, etc.		Fact Sheets, Manuals, Information Packets		Newsletters		Pollution Prevention Assistance		Permit and Compliance Assistance		Teleconferences		Other	
Oregon	162	162	2	2	37	423	82	547									35* 9* 10* 25*	35 9 10 25
Pennsylvania	1,508	1,200	14	14	3	150	Yes	389	4	1,200			9	9			13* 788* 28*	13 165 N/A
Puerto Rico		~200		~100	14		Yes											
Rhode Island	150*	150	40	40	2*	~700	5	~2,000										
South Carolina*	171	N/R	24	N/R	Yes	N/R											4	N/R
South Dakota	60	60	10	10	5	220	5	800										
Tennessee	512	412	147	147	193	2,225	1,533	1,533									35* 1,060*	35 1,060
Texas	Included in Table E-6: Personal/Technical Assistance		96	96	27	767	16	23,800	Included in Table E-8: Fact Sheets, Manuals, Info Packets				Included in Table E-6: Personal/Technical Assistance		3	142		
Utah	267	267	35	35	43	3,089	17	1,335	3	2,700			231	231			2* 2*	160 230
Vermont	0	0	0	0	0	0	0	0										
Virginia	525	525	3	3	88	2,210+	3	425+			1	900	1	7	2	21*		
Virgin Islands	50	50	50	50	5	50	1,373	75										
Washington																		
Ecology	150	N/R	2	N/R	8	125	2	900										
Ecology CRO					3	63	9	101										
BCCAA	20	20	43	N/R														
OAPCA	335	N/R																
SCAPCA	300-500	300-500	400	400	2 1	40 250	2	250									1* 1*	100 100

**TABLE E-7
(Continued)**

Program	Number of Services Provided / Number of Businesses or Individuals Reached																
	General		On-Site Visits		Seminars, Workshops, Meetings, etc.		Fact Sheets, Manuals, Information Packets		Newsletters		Pollution Prevention Assistance		Permit and Compliance Assistance		Telephone/visits		Other
SWAPCA	7	136															
YRCCA	1,327	1,327	240	240	2	18	2	192									
West Virginia	264	138	41	33	4	30	N/A	400					21	21			
Wisconsin	696	696	35	35	48	2,285	24	25,983									
Wyoming	13	276			3	90	13	306			2	2	9	9	4	8	2*
TOTAL*	37,494	36,411	5,348	5,326	1,354	35,433	21,513	117,935	33	26846	28	1029	641	840	27	640	11,737

***Notes:**

TOTALS do not reflect programs answering, "yes." Figures such as "500+" are tallied as 500. The figure, 21,513, for fact sheets, etc. is likely inflated, as several states apparently reported the number of copies of a particular fact sheet, etc. distributed rather than the number of single titles developed.

AK SBTCP database was not in use until July 1, 1996. Therefore, the numbers listed in this report are only for a 6 month period. SBO and SBAP activities are not tracked separately; these figures are the same as those listed for SBO.

CA 780 helpline calls; Other: hundreds of meetings with regional permit assistance centers

CA SCAQMD has not been tracking business assistance statistics by SIC code. However, we are in the process of adding this feature to our tracking system.

ID 1 survey: Potential MACT Printers

IN 2 mass mailings done by gas companies on behalf of IDEM to inform customers of regulations. Electronic assistance: FaxBack-7,200 faxes and IDEM Online-1,318 hits (last half of 1996)

LA 1 web page
4 media interviews
3 targeted letters

MI 641 telephone and in-person requests for technical assistance (FY95-96).
29 facility tours and consultations (no on-site audits) by SBAP staff (FY95-96).
22 seminars, workshops, meetings, etc. that were initiated externally from SBAP, but included participation by SBAP staff (i.e., as speakers, resource staff, etc.) (FY95-96).
2 workshops initiated, developed, and delivered by SBAP (FY95-96).

MA Since SBAP constitutes a subset of OTA activities, only those services and workshops dealing w/SBAP activities are listed.

MS Auto body shops

NJ 2 P2 for Small Business Conference
2 Environmental Air Compliance Audit Seminar; 4 Air Permit Workshops & Air Waste Management Conference

NV 11 referrals.

NH 8 EPA initiative meetings.

NY 2 issues of newsletter (issue 1:4,000, issue 2: 5,000). Drafts of 3 compliance guides: 140 surface coaters, 190 graphic arts, 75 gasoline transport.

OH 19 customer meetings, 4 mass mailings, and an unknown number of "hits" on an electronic BBS and internet homepage.

OK 7 special projects.

**TABLE E-7
(Continued)**

OR	35 state SBAPs, 9 stratospheric ozone, 10 consultants, 25 other (hazardous waste, solid waste, water).
PA	13 Air Quality Improvement Fund (loan program) Computer Bulletin Board: 788 contacts/165 new users 28 resource centers
RI	150 general assistance and on-site visit data are estimates based on efforts of the SBAP with technical support from pollution prevention engineering staff. 1996 Rhode Island Pollution Prevention Conference and Exposition drew about 700 people over three days in October. A satellite downlink was hosted in May for approximately 30 lithographic printers.
SC	Figures for SBO and SBAP combined. 4 enforcement negotiations (with SBO).
TN	35 ISBMG, 1,060 notifications.
UT	2 trade shows/display booth, 2 permit amnesty programs.
VA	Served as sponsors and hosts for Wood Furniture and Printing Downlinks at 21 SBDC centers through 2 coordinating offices providing P2 and compliance training to constituents.
WA	1 City/County Pre-Development Conference. 1 NOC/NOI Process. 1 SEPA Process.
WY	Visit Colorado CAP meeting.

TABLE E-7 (Continued)

PUBLICATIONS

A number of states provided lists of their available publications.

CONNECTICUT

- Small Business Assistance Program Brochure
- Policy Statement and Certificate on Tax Credits and Exemptions for Air Pollution Control Equipment
- Title V Operating Permit Program Booklet, "It's Time to Decide" If Your Facility is Subject to Title V
- Fundamental Assistance for Small Title V Sources (FAST Vs) Training Manual
- Guide to Emission Factors
- Compliance Kit for Auto Body Shops
- Compliance Kit for Metal Finishers
- Compliance Kit for Dry Cleaners
- Fact Sheet on the General Permit to Limit Potential to Emit

KENTUCKY

Publications prepared by KY Small Business Environmental Assistance Program

- Brochure - Good News for Small Business
- Training Manual - The Clean Air Act and Your Small Business
- Workbook - Kentucky Division for Air Quality Refrigerant Guide
- Workbook - Clean Air Act Compliance for Chromium Emissions from Electrolytic Process
- Handout - Design Criteria for Stage I Vapor Control System Gasoline Service Stations
- Fact Sheets
 - Final Rule Equivalent Emission Limitations Under the CAA S1112(J), 4/29/94
 - Final Air Toxics Rule for Controlling Ethylene Oxide Emissions, 11/21/94
 - Final Air Toxics Rule for Aerospace Manufacturing, 7/31/95
 - Supplemental Notice Proposing Revisions to the CAA Operating Permits Regulations, 8/21/95
 - Proposed Rulemaking for Constructed, Reconstructed, or Modified Major Sources Under Section 112(g) of CAA, 3/1/94
 - Final Air Toxics General Provisions Rule, 3/1/94
 - Proposed Open Market Trading Rule for Ozone (Smog) Precursors
 - Final Air Toxics for the Petroleum Refining Industry, 7/28/95
 - Proposed Air Toxics Rule for the Secondary Lead Smelter Industry, 5/31/94
 - Final Air Toxics Rule for Chromium Emissions from Hard and Decorative Electroplating and Anodizing Operations, 11/15/94
 - Final Air Rules for Marine Tank Vessel Loading Operations, 7/28/95
 - Proposed Air Toxics Rule for Elastomer Production, 5/26/95
 - Proposed Rule for Controlling Epichlorohydrin Emissions from the Manufacture of Basic Liquid Epoxy Resins and Non-Nylon Polyamide Resins, 4/29/94
 - Proposed Rules for Marine Tank Vessel Loading Operations, 4/29/94

Publications prepared by Kentucky Air Quality Ombudsman

- Brochure - Kentucky Small Business Stationary Source Technical and Environmental Compliance Assistance Program
- Plan - Kentucky Small Business Stationary Source Technical and Environmental Compliance Assistance Program
- Column - "News from Air Quality Ombudsman," March-October 1996

LOUISIANA

Documents distributed by Louisiana SBAP in 1996:

- Air Quality Regulations Affecting Wood Furniture
- Louisiana Department of Environmental Quality's Small Business Assistance Program
- Regulations on the Internet
- Final Rule Issued for Wood Furniture Manufacturing Operations

VIRGINIA

- Wood Furniture Manufacturing MACT Fact Sheet
- Lithographic Printing Processes RACT Rule Fact Sheet
- Flexographic, Rotogravure, and Publication Rotogravure Printing Lines RACT Rule Fact Sheet
- New SBAP Brochure (Prepared 1996, distributed 1997)
- Self-Assessment Guide (Prepared 1996, distributed 1997)

TABLE E-7
(Continued)

WISCONSIN

Wisconsin's program has created the following recordkeeping reports and charts.

- **Dry Cleaning**
 - Perc consumption chart.
 - Weekly monitoring perc concentration in carbon adsorber chart.
 - Refrigerated condenser temperature chart for washer.
 - Refrigerated condenser temperature chart for dry-to-dry.
 - Leak detection inspection form - corrective action report - initial notification report.
 - General operation permit application (reviewed).
 - Compliance status report.
- **Solvent Cleaning**
 - Initial notification report.
 - NR 423 solvent RACT rule flowchart.
- **Chrome Plating**
 - Notice of compliance status.
 - Ongoing monitoring records.
 - Ongoing compliance status report.
 - Notice performance test.
 - Work practice standards records.
 - Initial notification report.
- **Automotive**
 - Initial notification report.
- **Wood Furniture**
 - Initial notification report (RACT).
 - Initial notification report (MACT).
- **Printing**
 - Initial notification report.
 - MTE calculation sheet (distributed).
 - Compliance certification form.
 - Recordkeeping form for all fountain solutions.
 - Recordkeeping form for refrigerated fountain solutions.
 - Recordkeeping form for blanket or roller washes.
- **Crushing**
 - General operation permit application (reviewed).
 - Checklist for crushers.
 - NSPS testing requirements.

Wisconsin's Small Business Clean Air Assistance Program Publications

- **General Information**
 - Air Pollution Permits for Small Business
 - Clearing the Air on Environmental Consultants
 - Clean Air Consultants
 - Financial Assistance to Small Businesses for Clean Air Compliance
 - Wisconsin's Small Business Clean Air Assistance Program
 - Air Pollution Primer for Small Businesses
 - Solvent Cleaning Regulatory Overview
 - Facts About Air Pollution Control Construction Permits
 - Air Operating Permits for Small Businesses
 - Salvaging Refrigeration and Air Conditioning Equipment
 - Pollution Prevention Clearinghouse Order Form
 - Environmental Information Summary
- **RACT Facts**
 - Facts About Solvent Metal Cleaning RACT
 - Facts About Wood Furniture Coating RACT
 - Facts About Industrial Adhesives RACT
 - Facts About Lithographic Printing RACT
 - Facts About Motor Vehicle Refinishing RACT
 - Facts About Miscellaneous Metal Parts RACT

TABLE E-7
(Continued)

MACT Facts

- **Facts About Aerospace Manufacturing and Rework Industry MACT**
- **Facts About the Chromium Electroplating MACT**
- **Facts About Dry Cleaning MACT**
- **Facts About Solvent Cleaning MACT**
- **Facts About Wood Furniture Manufacturing Operations MACT**

**TABLE E-8
SBAP TELEPHONE HOTLINE INFORMATION**

PROGRAM	TOLL-FREE		NOT TOLL-FREE
	NATIONAL	IN-STATE ONLY	
Alabama	800-533-2336		
Alaska		800-510-2332	
Arizona		800-234-5677 Ext. 4337	
Maricopa Cty	None		
Pima Cty			520-740-3342
Arkansas	None		
California		800-ARB-HLP2	
SCAQMD		800-388-2121	
Colorado	None		
Connecticut		800-760-7036	
Delaware		800-789-4599	
District of Columbia			202-645-6093 Ext. 3071
Florida		800-722-7457	
Georgia	None		
Hawaii	None		
Idaho	None		
Illinois		800-252-3998	
Indiana		800-451-6027 Ext. 2-8172	
Iowa	800-422-3109		
Kansas	800-578-8898		
Kentucky	800-562-2327		
Jefferson Cty	None		
Louisiana		800-259-2890	
Maine		800-789-9802	
Maryland	800-433-1247		

TABLE E-8
(Continued)

PROGRAM	TOLL-FREE		NOT TOLL-FREE
	NATIONAL	IN-STATE ONLY	
Massachusetts	None		
Michigan	800-662-9278		
Minnesota		800-657-3938	
Mississippi		800-725-6112	
Missouri	800-361-4827		
Montana	800-433-8773		
Nebraska	None		
Nevada		800-992-0900 Ext. 4670	
New Hampshire		800-837-0656	
New Jersey			609-292-3600
New Mexico	800-810-7227		
New York		800-780-7227	
North Carolina	800-829-4841		
North Dakota		800-755-1625	
Ohio			Not reported
Oklahoma	800-869-1400		
Oregon		800-452-4011	
Pennsylvania	800-722-4743		
Puerto Rico			787-767-8025
Rhode Island		800-253-2674	
South Carolina	800-819-9001		
South Dakota	None		
Tennessee	800-734-3619		
Texas	800-447-2827		
Utah	800-270-4440		
Vermont		800-974-9559	

TABLE E-8
(Continued)

PROGRAM	TOLL-FREE		NOT TOLL-FREE
	NATIONAL	IN-STATE ONLY	
Virginia		800-592-5482	
Virgin Islands	None		
Washington			360-407-6800
West Virginia		800-982-2474	
Wisconsin	800-435-7287		
Wyoming	None		

**TABLE E-9
INFORMATION ON STATE SBAP ELECTRONIC BULLETIN BOARDS OR WEB PAGES**

PROGRAM	BULLETIN BOARD OR WEB PAGE ADDRESS	USAGE DURING REPORT PERIOD	INFORMATION AVAILABLE											
			Regulations	P2 Information	Application Forms	Permits	Program Description	Calendar of Events	Fact sheets, etc.	Guidance Documents	Contact Listings	Permit Info	Emission Inventory	Other
Alaska	http://www.state.ak.us/local/akpages/ENV.CONSERV/dcps/dec.dcps.htm	New for 1997; not operational in 1996	No (but available through Air Quality web site)	Yes										Yes*
Arizona	www.state.az.us/adeq	Not operational in 1996; will be operational April 1997.						Yes				Yes	Yes	
Maricopa Cty	http://www.maricopa.gov/envsvc/sbeap.htm	48,000+	Yes	Yes			Yes							Yes*
California	916-322-2826	817 registered users	Yes											
SCAQMD	http://www.sqmd.gov	1,142,973 (9/96-4/97)	Yes	Yes								Yes		Yes*
Colorado	www.state.co.us	N/R	Yes	Yes										
Connecticut	BBS: 860-424-4127 com.settings:N 81	150 hits	Yes	Yes				Yes	Yes	Yes				
Florida	www.dep.state.fl.us/air	N/A	Available only through Dept's network	Under Division of Waste Mgt at same web site	Air permit forms	Regulatory guidance memo								
District of Columbia	202-645-6101	200/week	Yes											
Georgia	http://www.dnr.state.ga.us	N/A	Yes	Yes				Yes						
Illinois	http://www.ilcommerce.com	816 orders / downloads	Yes	Yes	Title V permit applications				Yes					Yes*
Indiana	IDEM Online: http://www.ai.org/idem FaxBack Directory: http://www.ai.org/idem/faxback.html	IDEM: 1,318 since 7/96 Fax: 7,200	Yes	Yes	Yes	Yes			Yes	Yes	Yes	Yes		Yes*
Kansas	http://sbeap.nlar.twsu.edu	202 since 10/9/96	Yes (KS Air Qual. perm. and link to USEPA site)	Yes				Yes						Yes*

TABLE E-9
(Continued)

PROGRAM	BULLETIN BOARD OR WEB PAGE ADDRESS	USAGE DURING REPORT PERIOD	INFORMATION AVAILABLE											
			Regulations	PG Information	Application Forms	Policies	Program Description	Calendar of Events	Fact sheets, etc.	Guidance Documents	Contract Listings	Project Info	Statistical Inventory	Other
Kentucky	http://Getton.gws.uky.edu/KentuckyBusiness/kbep.htm	Not operational during 1999	Requested	Yes										Yes*
Louisiana	http://www.deq.state.la.us/oerp/sbep/sbep.htm	N/A (online since 11/98)	Fact sheets	Yes	Yes	Yes								Yes*
Maine	http://state.me.us/dep/mdephome.htm	N/A	Yes	Fact sheets and links		Yes	Yes			Yes				
Maryland	http://mda.state.md.us	Under devel.	Under devel.	Under devel.										
Massachusetts	617-727-5621 (OTA On-line BBS)	214 log-ons	Yes	Yes	Yes	Yes							Yes	Yes*
Michigan	http://www.deq.state.mi.us/eod/eosect/casap/	616 (FY95-96)						Yes	Yes	Yes				
Minnesota	http://www.pca.state.mn.us	Started 1/1/97	Yes	Yes			Yes		Yes	Yes	Yes			Yes*
Missouri	http://www.state.mo.us/dnr/deq/tap/hometap.htm						Yes							Yes*
Nevada*	http://www.scs.unr.edu/sbdc/bep	N/A		Yes										
New Jersey	http://www.state.nj.us/commerce/casbo.htm	120 downloads (SBAP section of BBS)	Yes		Yes			Yes		Yes	Yes		Yes	Yes*
New Mexico	Bulletin Board: 505-827-1552 Home page: nmenv.state.nm.us	1,500	Yes											
North Carolina	http://www.owr.ehwr.state.nc.us/osbo.htm http://www.owr.ehwr.state.nc.us/epic.htm	Unknown (connected to DFLPA home page)		Yes				Yes	Yes					

**TABLE E-9
(Continued)**

PROGRAM	BULLETIN BOARD OR WEB PAGE ADDRESS	USAGE DURING REPORT PERIOD	INFORMATION AVAILABLE											
			Regulations	P2 Information	Application Forms	Publicity	Program Description	Calendar of Events	Pack sheets, etc.	Software Comments	Current Listings	Permit Info	Enrollment Inventory	Other
Ohio	http://www.epa.ohio.gov/dapc/sba/sbaintro.html	N/A	Yes (BBS only)	Yes	Yes				Yes	Yes	Yes			Yes*
Oklahoma	http://www.state.ok.us/~deq/	Not operational	Planned	Planned		Planned		Planned	Planned	Planned				
Pennsylvania	SBAP maintains computer bulletin board under contract with PRC at 1-800-864-7594. Modem settings: parity = none; data bits = 8; stop bits = 1; duplex = full. PA Department of Environmental Protection web site with similar information to the bulletin board: http://www.dep.state.pa.us	788	Yes	Yes	Yes	Yes		Yes					Yes	Yes*
South Carolina	http://www.state.sc.us/dhec/sbap.htm SCDHEC EQC Bulletin Board: 803-734-4535 or 3752	174 (home page since 8/98)	Yes	Yes										Yes*
South Dakota	http://www.state.sd.us/state/executive/denr/denr.html	Unknown									Yes			
Tennessee	http://www.state.tn.us/environment	N/A (new service)	Yes	Yes			Yes							
Texas	http://www.tnrc.state.tx.us/exec/small_business/index/html	1,079	Yes	Yes	Yes	Yes thru links	Yes	Yes	Yes thru links	Yes	Yes thru links	Yes		Yes*
Utah	http://www.eq.state.ut.us/eqair/sbap/sbap3.htm	N/A	Yes	Yes										Yes*
Virginia	http://www.deq.state.va.us	N/A	Yes	Yes	Yes	Yes			Yes	Yes		Yes		Yes*

TABLE E-9
(Continued)

PROGRAM	BULLETIN BOARD OR WEB PAGE ADDRESS	USAGE DURING REPORT PERIOD	INFORMATION AVAILABLE											
			Regulations	PG Information	Application Forms	Permits	Program Description	Calendar of Events	Fact sheets, etc.	Guidance Documents	Quarterly Update	Project Info	Exclusion Inventory	Other
Washington	Dept. of Ecology: http://www.wa.gov/ecology Air Quality Program: http://www.wa.gov/ecology/air/airhome.html Olympic Air Pollution Control Authority: http://www.win.com/~oapca/sbs.html Puget Sound Air Pollution Agency: http://www.psapca.org/business/htm Northwest Air Pollution Authority: http://www.pacificrim.net/nwapa/smbus.htm Southwest Air Pollution Control Authority: http://www.cascadiaweb.com/~cci/baqap.htm	No information	Yes	Yes			Yes		Yes		Yes			Yes*
West Virginia	304-558-3053	Unable to track	Yes		Yes		Yes	Yes						Yes*
Wisconsin	http://badger.state.wi.us/agencies/commerce	N/A					Yes				Yes			
Wyoming	307-777-5465	Unknown	Yes	Yes					Yes					Yes*

*Other

- AK Multimedia information, hazardous waste, used oil, batteries, partnership program.
- AZ Maricopa Cty: Trip reduction program.
- CA SCAQMD: Business assistance, compliance program, permit assistance, clean air technologies.
- IL Online ordering of all clearinghouse documents.

**TABLE E-9
(Continued)**

IN	Link to Legal Services Agency, order form for IN environmental regulations, checklists.
KS	Online version of quarterly newsletters, online versions of SBEAP publications.
KY	Regulation promulgation schedule, notice of public hearings, newsletter.
LA	Policy, 40 industries with CAAA rules that affect them, housekeeping suggestions, reporting dates, final rules as promulgated, financial assistance, introduction to the ombudsman, SBAP hotline number, SBAP permit fee schedule, quarterly newsletter "Recordkeeping."
MA	MA multi-media permitting efforts. Other non-SBAP issues.
MN	Press releases.
MO	Requests for assistance.
NJ	Checklists.
OH	OEPA DAPC News Bulletins.
PA	Miscellaneous air pollution documents.
SC	Publications
TX	Copies of regulations and P2 information available through TNRCC main home page. Industry-specific information, EnviroMentor Program information, and links to other government sites available through SBAP home page.
UT	Free downloadable computer software.
VA	Hotlinks to other federal and state sites, source-specific compliance/P2 information, public notices/rulemakings, board memberships, environmental education, publications, news releases.
WA	Links to industry-specific web sites, environmental conditions and trends, news and events.
WV	List of regulation titles.
WY	CAP meetings.

Comments:

AK	New web site. Have not received any comments from the public. However, the information that is on the web site has been handed out in hard copies. So far, the responses have been positive about the factsheets. Existing factsheets on air permitting issues have been distributed to interested and affected businesses. Additional factsheets are being prepared based on input and requests from the public and other Department offices.
AZ	Maricopa Cty: The first year web site was selected top 10 web sites for small business from American Group Purchasing Association. This year, I want to have one of the top 3 sites in the country.
CA	We have recorded a noticeable drop in BBS usage, particularly the last half of 1996. We attribute this, in part, to our expanded web site and more seekers being equipped to reach us via the Internet. We do seek feedback on both BBS and web site. We plan to decommission the BBS in June 1997 and have a referral on BBS to our helpline and web site. The feedback generally has been for information requests, and this is usually handled by helpline.
CA	SCAQMD: All comments on the home page are routed through the District's media office. Feedback specific to the Small Business portion of the home page is not readily available at this time.
CT	Very favorable reports received (on BBS) in terms of improved accessibility to cumbersome, sometimes hard-to-find information. Requests for more information to be made available. The department is in the process of establishing a web page and many have requested that the two be linked.
GA	We have not received any comments on the web site itself. However, we have had requests for workshops advertised on the web page.
IN	Internet: Feedback is not yet being sought. FaxBack: A survey was sent to users of the FaxBack system. On a scale from 1-7 (useless-very useful), the overall rating for the system was a 6. The FaxBack system serves all businesses within the state and has been particularly useful to small businesses seeking information on IN's Title V program. Because of the outreach efforts made regarding Title V, CTAP and OAM were able to inform businesses of the FaxBack system and to encourage its use. CTAP also worked closely with OAM to ensure that newly created forms and guidance documents were added to the system. There are over 300 documents available via the FaxBack system, all of which will be made available via the Internet in 1997.
KS	No requests for subscriptions received.
ME	We have not received any comments. Not soliciting feedback at this time on the home page.
MA	Comments from users were generally positive, although new services and items were suggested in several instances.

TABLE E-9 (Continued)

MO	We have had some feedback and have received compliments about our home page. We have received several requests for assistance through the Internet, and the number of requests is increasing considerably.
NV	SBAP and SBO do not have current access to an Internet home page nor do they have a bulletin board to which they post items. Both SBAP and SBO have access to the Air Quality Bulletin Board at U.S. EPA. This home page is run by the NV SBAP/SBO contractor and includes a lot of P2 issues. Plans are for NDEP to have access to a home page in 1997. If so, SBAP/SBO plan to create a home page for regulations, technical information, and limited P2.
NM	Positive verbal comments on the availability of BBS.
NC	Received minimal use. Most often, clients sought information on financial assistance or how to start a business, rather than environmental assistance.
OH	Few (less than 5) customers used the home page to learn of the SBAP. Most customers are not using the Internet to find environmental information at this time, but usage is expected to increase in the near future. Most small businesses report not having the time to do Internet searches for information. Home page development has proceeded moderately, and was not a high priority item during 1996. SBAP received little feedback on the home page design, with the exception of the CAP, who generally were pleased with it.
SC	Several people have commented positively on information and links available on home page.
TX	Verbal comments. Good links back to TNRCC main home page. Easy to maneuver. Great layout.
UT	We have not received any feedback from users of this service.
VA	The Small Business Assistance web page actively seeks information and critique from our peers. The development of the SBAP page under EPA Leadership Grant is just part of the web site activity of the agency. What I will call the second generation or enhanced version of the SBAP page was just recently posted. The agency web site coordinator is still developing the counter program so that accurate numbers on site activity can be developed. Based on what we have is that the "enhanced" version of the SBAP page was entered 48 times in 1/97. In relation to the web site, we expect a great deal more activity based on approximations of entry into the DEQ web site, which currently stands at approximately 3,000 per month with an estimated 15,000 entries into different pages of the site. DEQ page also is currently receiving approximately six favorable comments per month from satisfied users, a number we also think is indicative of the usefulness of the site as a whole.
WA	There is a feedback capability on the web site. To the best of our knowledge, there have been no entries.
WV	Most of the clients we help seem to prefer one-on-one and/or telephone assistance from a knowledgeable person rather than trying to search through computer files.

**TABLE E-10
MAJOR CAP ACTIVITIES**

State	Review of documents for readability and/or content	Appointment/hiring of staff and/or election of officers	Review of SBO/SBAP outreach efforts	Review/comment on proposed/new regulations	Definition of CAP responsibilities	Attendance by CAP members at training sessions, etc.	Advisement about effective outreach activities	Assessing small business concerns based on contacts	Other (See below)
AL	N/R								
AK	No activities								
AZ	No activities								
Maricopa Cty	N/R								
Pima Cty	N/R								
AR				X					
CA	N/A								
SCAQMD	N/A *								
CO	X		X		X		X		
CT	X	X	X		X	X	X	X	X
DE	CAP not appointed								
DC	Not operational								
FL									X
GA		X	X				X		X
HI	N/A								
ID	N/A								
IL		X							
IN	X		X				X		X
IA	None								

TABLE E-10
(Continued)

State	Review of documents for readability and/or content	Appointment/hiring of staff and/or election of officers	Review of SBO/SEAP outreach efforts	Review/comment on proposed/new regulations ^a	Definition of CAP responsibilities ^b	Attendance by CAP members at training sessions, etc.	Advice about effective outreach activities	Assessing small business concerns based on contacts	Other (See below)
KS	X	X	X			X	X		
KY	X		X	X		X	X	X	X
Jeff. Cty	See KY								
LA		X							
ME							X		
MD	N/A								
MA	N/A								
MI	X		X		X		X		
MN									X
MS									X
MO	N/A								
MT							X		X
NE							X		
NV	X		X	X	X	X	X		X
NJ		X							
NH	X		X				X		
NM	X	X							
NY	N/R								
NC			X				X	X	X
ND	X	X		X			X		

**TABLE E-10
(Continued)**

State	Review of documents for readability and/or content	Appointment/hiring of staff and/or election of officers	Review of SBO/SBAP outreach efforts	Review/comment on proposed/new regulations ^a	Definition of CAP responsibilities ^b	Attendance by CAP members at training sessions, etc.	Advice/ment about effective outreach activities	Assessing small business concerns based on contacts	Other (See below)
OH	X	X	X		X				
OK					X				
OR	X	X	X	X			X		X
PA	X		X	X	X				
PR	Unknown								
RI	None								
SC	N/A								
SD								X	
TN	N/A								
TX	X	X	X	X	X	X	X	X	X
UT	X		X	X	X		X		X
VT	None								
VA	X	X							
VI	None								
WA	X		X				X	X	X
WV	X		X	X			X		X
WI	X		X	X			X	X	X
WY			X		X				X
TOTAL	19/36%	12/23%	19/36%	10/19%	10/19%	5/9%	20/38%	7/13%	17/32%

N/A Not applicable

TABLE E-10
(Continued)

- a Includes policies, guidelines, etc.
- b Includes establishing internal procedures, defining meaningful roles for members, and developing means of measuring effectiveness.
- c Such as marketing and review of training programs, guidance document development, etc.

Other activities:

CT	Leveraging resources through trade associations, vendors, suppliers, and small business trade publications.
FL	CAP met with SBAP 6/96.
GA	CAP met 4 times during 1996. GA Air Quality Rules were revised to reflect the CAP's length of service and its structure.
IN	Reviewed and commented on new programs and personnel including Agriculture Liaison (position created and filled in 1996), Environmental Performance Partnership between IDEM and EPA, Environmental Circuit Rider Program, IDEM's proposal to "re-engineer" the agency.
KY	Assistance provided to dry cleaners, and upcoming state regulatory calendar for small businesses.
MN	Due to scheduling difficulties, council only met two times during 1996. Both meetings were productive exchange of information between council members, SBAP staff, and trade association members (grain elevators, dry cleaners, and service stations).
MS	Panel members have continued to be sensitive to concerns of the small business community. Early in the year, the ombudsman position was expanded to include other media. It is now located outside the air division, which gives it even more independence in dealing with air issues. The ombudsman is 3/4 time to Title V and two other staff members are 100% Title V. A small business newsletter is published monthly that calls attention to the various workshops and their locations. SBAP has assisted quite a few businesses this year. Other parts of the report will detail these activities. We feel the needs of small businesses are being met quite adequately.
MT	Met with SBO/SBAP to help develop legislative strategy for creating small business environmental loan program. Helped SBO evaluate nominees for small business award program.
NV	Reviewed and instructed staff to prepare letter of concern on auto repair facility technician training. This impacts small businesses, even though technically they are not stationary sources. Review of new requirements for dry cleaners led to development of a workshop by SBAP's contractor, BEP, for outreach to dry cleaners on their requirements to get into compliance with new regulations.
NC	Members have spoken to local civic and business groups to share information on our SBAP and identify small business needs.
OR	CAP/SBAP sponsored workshop for perchloroethylene solvent dry cleaners and affiliated industries and individuals to discuss environmental regulations. Solvent vendors, equipment sales and repair representatives, and members of the Oregon and Korean Dry Cleaners Associations attended. CAP assisted SBAP and Environmental Cleanup staff with implementation of new cross-media program for cleaning contaminated dry cleaning sites. CAP collaborated with Pollution Prevention Resource Center through SBAP to develop small business technical information brochures and P2 guidance documents.
PA	Provided review and comment on legislation transferring the ombudsman office to the Department of Environmental Protection, Office of Pollution Prevention and Compliance Assistance. Evaluated the roll-over of the Air Quality Improvement Fund into the Small Business First Loan Program.
TX	Two meetings.
UT	Extended an invitation for the UT P2 Association to send a representative to regular meetings as a liaison to both groups. CAP is preparing an outreach plan for inviting industry representatives to attend meetings.
WA	Participated in Region X "Success Methods" survey.
WV	Considered other media (e.g., water solid waste) regulatory impact on small businesses. Initiated actions to institute a small business environmental loan program.

TABLE E-10
(Continued)

WI	Discussed and commented on the reorganization of the WI DNR. Discussed Treatment of Tribes as States and how it could relate to small businesses. Made suggestions to representative from IL CAP. Assessed current state initiatives regarding ISO 14000. Authored "Council's Corner" articles on EPA Policy on Compliance Incentives for Small Business, NR1.52, and DNR reorganization for the SBAP newsletter.
WY	The CAP pursued a departmental policy on not seeking penalties for small businesses that voluntarily disclose non-compliance and seek assistance. In addition, the CAP believes that the SBAP needs confidentiality to effectively assist small businesses. Also, the CAP approved a SBAP operational plan and Handbook, which outlines the CAP's authority, duties, and responsibilities. Finally, the CAP supports the establishment of a western states CAP forum to develop an information exchange network.

Additional comments:

AK	Alaska's Title V program was not given interim approval by EPA until December 5, 1996.
CA	SCAQMD is a regional regulatory agency permitting approximately 30,000 sources. We are the largest of the 34 air districts in CA. We have historically used industry, community, and environmental group input into our programs. A CAP-like committee is being developed.
DE	CAP not appointed. Unable to motivate the legislators to make appointment.
IL	CAP has 3 people appointed. They have not met formally.
IA	Pending Governor's appointment.
LA	The new administration has appointed only 4 CAP members and they did not meet during 1996.
ME	Due to a restructuring of the Department and a temporary reassignment of the Ombudsman, the CAP only met once in 1996. During this meeting, the CAP reviewed the Department's recently issued Small Business Compliance Incentives Policy.
NV	Nevada CAP was still "getting up to speed" on air pollution issues in the state. The main topic of discussion was whether their "jurisdiction" included all three of the regulatory agencies (one state agency and two county health agencies). It was finally decided that advice could and would be given to all three entities on their air programs.
NJ	Appointments completed in late 1996. First CAP meeting scheduled for 1/10/97.
ND	The CAP expressed a willingness to advise the SBAP on multimedia issues; therefore, the CAP meeting last June and those in the future will be multimedia in nature. The CAP discussed issues regarding the impact of new rules and policies the environmental health section (multimedia) would be implementing.
RI	CAP not yet appointed. SBAP coordinator (1 FTE Environmental Planner hired in November 1996).
SD	The South Dakota CAP did not meet in 1996.
VT	CAP not yet appointed.

**TABLE E-11
MEETINGS AMONG SBO, SBAP, AND CAP**

FREQUENCY	SBO & SBAP	SBO & CAP	SBO, SBAP, & CAP	SBAP & CAP
Daily	AK, AZ, AR, CT, IN, KS, ME, MT, NH, NC, TN, VA, WA, WI, WY			
Weekly	GA, NH, OH, WV			
Biweekly	DC, CO, IL, MN, NV, UT	WI	WI	WI
Monthly	AL, LA, NJ, NM, NY	MA, MT		
Bimonthly	CA		OH	
Quarterly	IA, KY, RI	CT, GA, KS, Jeff. Cty, KY, MI, MN, NH, NC, WV	CO, CT, GA, IN, KY, MI, MS, NV, NC, PA, VA, WV, WY	CT, GA, MI, NC, OR, PA, WV, WY
Biannually	MS, TX	AR, ND, TX	AR, MN, ND, TX	AR, MN, ND, TX
Annually	OK	NM	FL; KS; Jeff. Cty, KY; MT; NM; WA	Jeff. Cty, KY; NH; NM; OK; WA
Occasionally	ID; Jeff. Cty, KY; MD; MI; MO; ND; PA; SD	AK, ME, WA, UT, VA	AK, ME, NE, UT	AK, ME, VA

Notes:

County programs not counted separately.

AK All meetings involving CAP held as needed or as requested by CAP.

AZ Dual role SBO/SBAP.

Maricopa Cty, AZ No response.

Pima Cty, AZ No response.

AR SBO/SBAP fully integrated.

DE No response.

HI N/A.

**TABLE E-11
(Continued)**

IN	SBO/SBAP meetings too frequent to track.
KS	SBO and SBAP meet daily via phone and personally at least quarterly.
MD	10 meetings in 1996 as needed.
MI	SBO/SBAP meet as needed.
NH	SBO/SBAP operated as one program.
NC	For meetings involving CAP, met twice (live) with other entities during 1996, but had quarterly telephone meetings.
ND	There are numerous, unrecorded in number, telephone conversations between the SBO and SBAP, and the SBO and CAP members during the calendar year.
PA	SBO vacancy 4/96. Quarterly CAP meetings planned.
SC	SBO/SBAP co-located. Other combinations did not meet.
SD	25 meetings held in 1996 on an as needed basis.
UT	SBO/CAP and SBO/CAP/SBAP met bi-monthly.
VT	No meetings held.
VI	No meetings held.
WA	Phone calls and periodic CAP/SBAP/SBO meetings.
WI	SBO supervises SBAP staff resulting in continuous contact.

**TABLE E-12
FINANCIAL ASSISTANCE PROGRAMS TO HELP SMALL BUSINESSES
COMPLY WITH CAA REQUIREMENTS**

The following states indicated that they are planning or have implemented a small business grant or loan program.

PROGRAM	DATE AVAILABLE	NAME OF GRANT/LOAN	FUNDING LEVEL
Arkansas	TBD	Small Business Revolving Loan Fund	\$3.5 million
California	1972	CA Pollution Control Financing Authority	\$6.8 billion (bond sales) for projects ranging from \$10,000-\$500,000
	1991	Air Quality Assistance Fund (South Coast Air Quality Management District)	\$1 million remaining (sunsets 1999)
	1995	Innovative Clean Air Technologies	\$1 million/year
SCAQMD, CA*	1991	Air Quality Assistance Fund Loan Guarantee	\$1,750,000
		CLEAN (State's portion)	\$3 million (\$750,000 from AQAF)
Connecticut	1997 or 1998	FAVRS Loan Guarantee Program (P2 and CAA compliance)*	\$5 million
Georgia	TBD	TBD	TBD
Indiana	8/94	P2 Challenge Grants	\$200,000 annually
Iowa	TBD	Property tax exemption	N/A
		Sales tax exemption	N/A
Maine	1/95	Green Fund	\$250,000 (1995)
Minnesota	7/95	Small Business Environmental Loan Program	\$250,000
		1997 legislative session: proposal to merge 2 existing loan programs	\$750,000 merged funding potential
Montana	5/97	Small Business/Environmental Loan Program	\$600,000 at 6% interest
New York	TBD		
Ohio	1st half of 1997	Financing assistance	No preset level*
		Grant program	\$150,000 annually*

**TABLE E-12
(Continued)**

PROGRAM	DATE AVAILABLE	NAME OF GRANT/LOAN	FUNDING LEVEL
Pennsylvania	1/94, 7/96*	Small Business First Program	\$3 million revolving fund
South Carolina	TBD	N/R	N/R
Virginia	1/1/98	TBD*	TBD
West Virginia	7/97	WV Small Business Environmental Loan	\$1-5 million
Wisconsin	12/94	Wisconsin Housing & Economic Development Agency (WHEDA) Clean Air Fund	\$1,000 - \$50,000
		WHEDA Ozone Protection Fund	\$1,000 - \$50,000

TBD To be determined
N/A Not applicable
N/R No response

***Notes:**

- CA SCAQMD: A loan guarantee program called the Air Quality Assistance Fund (AQAF) is available to small businesses located in Los Angeles, Orange, and the non-desert portions of Riverside and San Bernardino counties. These are not loans, but guarantees of repayment to lenders. This program was established to offer technical and financial assistance to small businesses to satisfy clean air requirements.
- CT A loan guarantee program was established in 1994. The program was called Financial Assistance for Vapor Recovery Systems and was primarily established to finance installation of Stage II Vapor Recovery. Preliminary work is underway to expand the program to make financial assistance generally available for small business environmental compliance.
- NY It is unclear when this program will become active. The New York State Clean Water/Clean Air Bond Act allocated \$60 million to assist small businesses with environmental compliance. The details of how this program will be conducted are still being determined.
- OH Financing assistance provided as a conduit program (i.e., done in conjunction with lending institutions) with no preset funding level. Grant program will provide grants to cover financing costs of small business loans to comply with CAA regulations. The funding source is a \$0.50/ton set aside from Title V fees, which is estimated to generate \$150,000 annually.
- PA The Air Quality Improvement Fund became available January 1994 and was subsequently rolled into the Small Business First Program as of July 1, 1996.
- VA Virginia is planning a Small Business Assistance CAA compliance and P2 activity loan fund. Legislation is scheduled for the 1997 General Assembly Session. Hopefully the loan fund will be established and operational by January 1, 1998.

**TABLE E-13
LEVERAGING OF RESOURCES**

Descriptions of how each component of the SBTCP leverages existing personnel resources (within the state) are provided in Table E-14. (Comments edited for space.)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Alabama	SBO staff is allowed the freedom to interact directly with regulatory staff to get timely answer to specific business questions. This eliminates the need to have detailed knowledge of all environmental programs available in the SBO office.	SBAP is conducted as part of overall permitting program in the Air Division.	
Alaska	Works with Department of Commerce to reach more small businesses.	Works with Air Quality program to ensure that efforts are not duplicated. Had only one private environmental engineering firm agree to hand out SBAP brochure to small businesses with which they interact. Local chapter of AWMA sponsored a program aimed at small businesses and have stated that they are willing to help partially fund any other outreach the SBAP may do in the future.	SBO/SBAP uses CAP to review fact sheets and other Departmental information. CAP members are from all parts of the state. Their names, addresses, and phone numbers have been put in different forums to allow businesses and concerned citizens to contact an individual outside the Department regarding Department activities.
Arizona	Agency ombudsman assists with complaints from small businesses.	Agency permitting engineers and compliance inspectors frequently refer businesses to SBAP and assist with workshops, training sessions, publication development, etc.	Agency CAP representative is the Deputy Director of the Agency.
Maricopa County	N/R	Example of leveraging was 2nd Annual Small Business Environmental Awareness Conference using a cadre of professional volunteers. Co-sponsored (4) industry-specific workshops with SRP, Association, and other stake holders.	N/R
Pima County	N/R	Program Manager of Information Services Division manages the Business Assistance Program with limited assistance from administrative staff and other division staff.	N/R
Arkansas	Operates through a multi-media, 12 member Advocacy Council with a single member appointed from each operating division of the Agency by the Director. Individual council members provide advice and counsel on the operations of a small business assistance program.	Sponsors pollution prevention program of the Agency. Utilizes multi-media inspection team from the Agency to perform voluntary compliance audits. SBAP also is recipient of US EPA Leadership Grant Award.	N/R

**TABLE E-13
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
California	Appointed by the Governor, supported by the Cabinet, other state agencies involved.	Some local air districts have this function and some local SBAPs are largely independent. Many state departments assist.	To be operational in 1997.
SCAQMD, CA	SCAQMD staff is assigned to assist one day per week at Cal/EPA permit assistance centers. Outreach efforts are coordinated with other public agencies, trade associations, chambers of commerce, local government representatives, and agency staff.	SCAQMD staff is assigned to assist one day per week at Cal/EPA permit assistance centers. AQMD provides counter-top displays in city and local government, business assistance, and permit services to refer customers to the AQMD's 1-800 SBAP numbers.	SCAQMD is working with other state and local programs to obtain ideas on how to make a CAP-type program work at a regional level. Our governing board recently authorized the development and implementation of a Local Government and Small Business Committee.
Colorado	1.5 FTEs are funded by the CO Department of Public Health and Environment, Air Pollution Control Division, Stationary Sources to staff the Small Business Ombudsman Office within the Department of Regulatory Agencies, Office of Regulatory Reform. The ombudsman staff works cooperatively with SBTAP staff to provide compliance assistance to the regulated small business community. The cost for joint meetings, workshops, and mailings is shared. Effective 6/30/97, the ombudsman office will no longer be located in the Office of Regulatory Reform. Senate Bill 96-1307 requires the ombudsman function to move to the CO Department of Public Health and Environment/CDPHE.	2 FTEs are funded by and located at the CO Department of Public Health and Environment. SBAP staff work to educate small business owners, internal staff (e.g., permit engineers, enforcement personnel), and outside agencies about air quality regulations.	CO CAP members are not compensated for their appointments. They are strictly volunteer. CAP meetings are held at various members' business locations and at the state offices on a rotating basis.
Connecticut	CT's SBO and SBAP are merged, and collectively the program leverages technical staff from within the Air Bureau to provide compliance assistance on air quality issues. The program utilizes staff from other Bureaus within the Department to provide multimedia assistance when requested. The program can access technical staff within the Air Bureau on a regular basis to provide permitting assistance, to help with the development of informational materials and fact sheets, and to participate in outreach events around the state. Recently, the SBO position was designated out of the Office of the Assistant Commissioner to begin to enhance linkages with the Water and Waste Bureaus and to enhance the multimedia capabilities of the SBAP. Additional resources are leveraged through partnerships with trade associations, quasi-public agencies, other state agencies, public utilities, local chambers of commerce, and programs established at CT universities. SBAP established effective partnerships with trade associations and vendors representing the autobody industry, the metal finishing industry, and the gasoline industry.		CT's CAP consists of 10 members. Other interested individuals attend meetings regularly and serve as non-voting members. Expanding participation beyond the 10 appointed members to include non-voting members has broadened the expertise of the panel while providing additional resources to participate in the development of subcommittees. This is helping to establish strong ties to the small business community and to publicize the availability of the SBAP.
Delaware	Ombudsman has access to technical personnel in engineering to help answer questions, complete permit applications, and interpret regulations at both State and Federal level.	Ombudsman serves as the SBAP.	N/R

**TABLE E-13
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
District of Columbia	SBO's salary is paid by the State Air Program grant.	No SBAP staff were hired. SBAP responsibility was added to an environmental engineer's responsibility. However, this has retarded the effectiveness of the program.	N/A
Florida	SBO works with Department's senior management in the development of compliance assurance strategies.	SBAP relies on Department's district air inspectors in providing compliance assistance with all air regulations. SBAP has begun a new partnership with Small Business Development Centers in giving onsite technical assistance. SBAP also relies on resources from Pollution Prevention's retired engineers for P2 instructions.	N/R
Georgia	The SBO also is program manager for Planning and Support program.	Two Environmental Protection Division Associates; one retired engineer works part time.	N/A
Hawaii	N/A; plan to maintain activity within Department of Health.	N/A; plan to maintain activity within Department of Health.	N/A; support of activity by Department of Health.
Idaho	SBO has worked extensively with Department of Commerce, Small Business Development Centers, Technical and Industrial Extension Service, and Division of Environmental Quality's Pollution Prevention Coordinator. For workshops, vendors, INEL representatives, local POTW managers, ID's universities, banking representatives, and DEQ regional office personnel have been utilized. SBO has worked closely with other Region X states (WA, OR, AK) to discuss common problems and entered into an agreement with the P2 Research Center to provide assistance with P2 issues under a leadership grant that is managed by Washington State.	SBAP works with all sections of DEQ to get correct and complete information to businesses. They also work with other professionals in other media to make sure that cross media concerns are addressed.	N/R
Illinois	SBO located within Office of Small Business, IL EPA. As such, it has the Agency's 1,200 employees available to provide one-on-one assistance to businesses, deliver speeches, and respond to inquiries.	37 SBDC's, 13 procurement technical assistance centers, 3 international trade centers, local chamber of commerce, economic development organizations, IL Manufacturers Association, IL Retail Merchants Association, the State Chamber of Commerce, National Federation of Independent Businesses, and many other support partners.	N/R

TABLE E-13
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Indiana	SBO has extensive support from Office of Air Management.	CTAP has extensive support from Office of Air Management.	N/A
Iowa	SBO hired a student intern for several months. Citizens' Aide/Ombudsman, Deputy Ombudsman, and office staff contribute their time as necessary to facilitate the duties of the SBO.	IAEAP hires part time and full time student assistants and interns from the University of Northern Iowa to help with client assistance during periods of heavy demand.	N/R
Kansas	SBO assists with P2 issues, edits division newsletter, coordinates dissemination of division (compliance) publications, works with other assistance providers. SBO is located in the Office of Pollution Prevention, Division of the Environment, KDHE, and is not located within the regulatory arm of the division.	KDHE elected to have SBAP operated outside the regulatory agency. KDHE operates the KS Small Business Environmental Assistance Program (SBEAP) by contract to a consortium composed of the University of Kansas, Kansas State University, and Wichita State University. Each university is responsible for portions of the program. Work assignments are based on which institution was best equipped to perform these duties. The determinations were based on each university's available resources, experience, staffing, and organization's mission. Technical assistance is provided through KS's Pollution Prevention Institute, an organization that provides small businesses with environmental technical assistance. The University of KS Center for Environmental Education and Training provides overall program coordination and produces the majority of printed materials used in the program. Wichita State University Center for Technology Application provides database and web site development for the program.	No budget.
Kentucky	SBO is coordinator on project to add user friendly features to regulations using resources across agency. SBO is also member of Environmental Partnership, a group of agencies that want to improve assistance to small businesses on environmental issues. Participation of SBO in agency Public Information/Education group, which has 30 members, is another leveraging method. Division for Air Quality has designated several people to assist SBO in completing requests.	KBEAP uses training and seminar facilities of Small Business Development Center network. KBEAP pursues opportunities to speak and provide training at trade shows and other conferences utilizing a "captive audience" approach. KBEAP works closely with the air quality agency on permitting and compliance issues to provide timely and accurate information, thereby avoiding repeating work. Finally, KBEAP communicates with other assistance providers for referrals and partnering on training and assessment activities.	CAP paid travel expenses for PA CAP Chairman to speak at June CAP meeting. Panel members have facilitated SBO and SBAP work with other organizations.

**TABLE E-13
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Jefferson County	Jefferson County' SBAP makes its resources of engineers, a library, and a meeting room and equipment available to Ombudsman as needed.	N/R	N/R
Louisiana	SBO utilized personnel of Forestry Laboratory at Louisiana State University to assist in the presentation of Wood Furniture Industry Teleconference.	SBAP utilized personnel of Office of Solid and Hazardous Waste and the Office of Water Resources to assist in preparing and implementing an amnesty program for foundries in LA.	N/A
Maine	SBO works closely with SBAP and other business service providers such as the Department of Economic Development and the Maine Chamber and Business Alliance to maximize effectiveness.	SBTAP is able to work with staff from Department's Office of Innovation and Assistance and other bureaus to assist in some functions. SBTAP also works with other business service providers such as the Maine Small Business Development Centers to maximize effectiveness.	CAP is a joint panel with 16 members. Functions of SBTAP oversight were merged with an existing panel charged with overseeing Toxics Use Reduction Program.
Maryland	N/A	SBAP leverages extensive resources within and without MDE. 100% of an air permit engineer's time is spent on small business air quality permits. Designated SBAP contact in every media administration to coordinate regulatory and permitting assistance. All outreach projects conducted jointly with Pollution Prevention Program. Three permitting engineers of MDE's Environmental Permits Service Center are designated resources for regulatory and permitting information. MDE's Office of Community Assistance coordinates logistics for all outreach activities. Trade associations partner with SBAP to host and advertise outreach seminars.	N/A

TABLE E-13
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Massachusetts	SBO function is provided by one of the 31 existing staff members of OTA, a team dedicated to multi-media P2 and toxics use reduction.	SBTCP currently operates primarily through OTA structure; there are 5 regional technical assistance teams with 4 staff/team. Each of these teams deals with SBAP issues as they arise from their requests for technical assistance. All multimedia pollution prevention activities (M2/P2) are provided free and confidentially for all MA companies. Compliance assistance is an important and increasing part of our activities. However, companies needing assistance with programs or plans under the TURA program must receive first priority.	Secretary and 5 to 10 of her top staff members meet monthly with business leaders. Other staff including the DEP Commissioner and Assistant Commissioner attend as needed (several times per year).
Michigan	Program funded 100% with state and county air quality fees (restricted funds).	Program funded 100% with state and county air quality fees (restricted funds), although many project costs (i.e., event marketing, bulk printing, etc.) are off-set through partnerships with regulatory agencies and private sector trade groups or recouped through fees (i.e., for workshops, guidance publications, etc.).	Unfunded
Minnesota	Networked and assembled short term and long term workgroups to leverage resources. Multimedia workgroups within MPCA including regional offices, OEA, MnTAP (CoMA-"Coordination of Multimedia Assistance"). P2 Assistance Providers Workgroup (OEA, MnTAP, MCES, MTI, DTED, MPCA, counties, etc.). Ongoing work with other agencies, government units, and associations (OSHA, ERC, counties, SBDCs, OEA, MnTAP, trade associations, etc.).	Wood Finishers Leadership Grant-Partnerships with MnTAP, SBDC, MPCA staff, Metropolitan County Hazardous Waste Staff, ERC, OSHA, WorkSafe Minnesota, NRR1, the Pine-Tique Furniture Company, Van Technologies, Crystal Cabinets, and Automated Building Components. Automotive Outreach-Partnerships with MPCA staff across media divisions; MnTAP; OEA; SBDC; R.J. McClellan, Inc. (publishers of <i>The Auto Body Journal</i> and <i>The Auto Repair Journal</i>); Automotive Service Association of Minnesota and their publication, <i>ASA News</i> ; Minnesota Automobile Dealers Association; and Northern Collision Business Association.	N/R
Mississippi	Other program staff assist the Ombudsman office with assistance on multi-media projects.	See SBO.	N/R

**TABLE E-13
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Missouri	MDNR's Technical Assistance Program assists with responding to requests for assistance from small businesses.	MDNR's regulatory programs provide highly technical information if TAP cannot respond to the request itself. The regulatory programs are not given information to allow them to identify the facility in question.	Only 2 members of the CAP have been appointed; however the remaining 5 will be appointed in the near future.
Montana	<p>MT Department of Commerce administers SBO/SBAP Loan Program and provides outreach for SBO through Regional Development Officers.</p> <p>SBO formed partnership with MSU P2 Program and US EPA for small business awards program.</p> <p>SBO formed partnerships with other assistance providers in the state to improve service delivery and communication.</p> <p>SBO works with personnel from MT Department of Environmental Quality's Pollution Prevention Bureau to provide assistance to small businesses with multimedia pollution issues.</p>	SBO/SBAP work with permitting engineers from MT Department of Environmental Quality's Permitting and Compliance Division.	SBO/SBAP rely on CAP Chairmen and other members for technical assistance on certain projects.
Nebraska	N/R	All three programs are managed by the same person, the "Public Advocate."	N/R
Nevada	<p>SBO uses BAQ and other agency files to get background information on problems that the ombudsman is assigned to investigate.</p> <p>SBO interviews staff members with knowledge of facility as well as facility personnel to get as complete a picture as possible of the unresolved issues.</p> <p>SBO uses reference materials of NDEP bureaus such as manuals, textbooks, printed literature, etc.</p>	<p>SBAP utilizes expertise of NDEP bureau staff in various media for technical information.</p> <p>SBAP works closely with UNR's Business Environmental Program through a contract to provide information to various impacted industries.</p> <p>SBAP works closely with the two county air districts and other state agencies for hands-on education of the various area sources, identification of industry needs, and outreach activities.</p> <p>SBAP uses libraries of NDEP's bureaus to research various impacted industries to better understand their processes.</p>	CAP utilizes information that SBO and SBAP collect to advise various air quality districts and SBTCPs on direction that programs should proceed.

**TABLE E-13
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Clark Cty, NV Air	Clark County Air Quality uses their own resources.		
Washoe Cty, NV Air	Washoe County AQMD has undertaken a number of new programs with the goal of maximizing the effectiveness of their personnel. Foremost is the preparation of Public Information Packets, which answer the vast majority of questions the public has, thus relieving staff from the duties of answering the same questions repeatedly. This also keeps the phone lines clear, which allows speedier responses to those with specific questions in regard to some of the unique aspects inherent in the diverse industries that AQMD regulates.		
NV BAQ	Two times per year, BAQ conducts compliance workshops. One to two staff members are given the task of presenting these workshops (typically 1 permitting and 1 compliance staff). Other workshops are presented as changes in federal and state regulations warrant.		
NV BEP	<p>BEP attempts to avoid duplication through coordination and communication of activities. Materials developed by other state and local programs and EPA are used to develop training and informational materials.</p> <p>BEP has operated since 1987 and has an extensive referral network with various trade associations, agency personnel, University personnel, and local development authority personnel.</p>		
New Hampshire	Administrative support from Air Resources Division. Developing working relationships with other advocates for energy, environmental, and legislative issues.	Close working relationship with NHDES P2 program. Developed cooperative ventures with trade associations, the university system, and other assistance providers.	Administrative support from DES Air Resources Division.
New Jersey	N/R	Coordinates with Air Permit, Air Enforcement, Air Planning and P2 staffs within DEP. Coordinates with NJ Institute of Technology CAP for P2 assistance. Works with trade associations.	N/R
New Mexico	Coordinating other assistance programs throughout the Department. Leading implementation of P2 initiatives through green zia program and hiring a P2 coordinator.	Other agencies, such as Economic Development, Small Business Development Centers, Chambers of Commerce, and local environmental field offices help with SBAP outreach. SBAP also networks with other bureaus to develop multimedia environmental management tools, workshops, and presentations for the printing, automotive, and manufacturing industries.	Legal assistance to CAP provided by Mr. Bill Brancard, NM Assistant Attorney General.

**TABLE E-13
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
New York	SBO is working the NIST MEP program to be sure that we are coordinated in our activities. In addition, SBO works with DEC Pollution Prevention Unit to co-sponsor events to avoid duplicate outreach programs. Where policy issues arise, the Empire State Development, Division of Policy and Research has assisted the SBO.	SBAP is able to subcontract with technical assistance providers. The SBAP also co-sponsors workshops with other providers of technical assistance, including local agencies, trade groups and associations, and DEC's Pollution Prevention Unit to leverage outreach to industry sectors and to avoid duplication of effort. As a unit within NYSEFC, SBAP is able to utilize support functions of the corporation and thus not incur their whole cost (e.g., photocopiers, fax, computer network maintenance, etc.).	N/R
North Carolina	NC Air Quality Division and Division of Pollution Prevention and Environmental Assistance have provided technical support and helped jointly to develop and hold workshops aimed at specific businesses and industry sectors. The three major regulatory programs (air, water, and hazardous waste) have lent one senior permit writer to the SBO for 1 year to develop multi-media permit information.	See SBO.	See SBO.
North Dakota	No personnel from other departments have been assigned to assist the SBTCP. However, the SBDCs and the Governor's office have been asked to assist in providing small businesses with certain information provided by the SBTCP. Within the Department, the SBO makes direct requests for assistance of the Division Directors and their staff.	SBAP is organizationally inseparable from the air pollution control program. The air pollution control program SBAP staff work closely with the SBO on assistance matters. Although not formally recognized yet as part of the SBAP under the Clean Air Act, other media programs (other than air) also work closely with the SBO on assistance matters.	The CAP relies greatly on information from SBO and SBAP to provide important feedback to SBO and SBAP. CAP receives information during CAP meetings with SBO and SBAP staff present in addition to periodic mailings of information. Outside agency resources haven't been leveraged by CAP to date.

**TABLE E-13
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Ohio	<p>SBO is located within OH Air Quality Development Authority, an independent state agency established to provide financing assistance to businesses investing in air quality issues. In addition to the budget provided through Title V fees, SBO received financial support from Authority resources.</p> <p>SBO cooperates closely with OEPA Division of Air Pollution Control in general and SBAP in particular. This ensures provision of accurate technical information to businesses. SBO also works with other state agencies, like OH Department of Development, to coordinate program delivery.</p> <p>Finally, SBO has assumed that the best access to small businesses in many instances is through the various trade associations, and SBO has worked to establish solid relationships with: Printing Industry of OH, OH Small Business Council, OH Chamber of Commerce, OH Bakers Association, OH Cleaners Association, OH Cast Metals Association, OH Chemical Council, National Federation of Independent Business OH, Automobile Service Association of OH, OH Petroleum Marketers Association, OH Council of Retail Merchants.</p>	<p>SBAP is located within OEPA Division of Air Pollution Control headquarters, allowing direct access to permitting, inspection, enforcement, and policy development questions. SBAP has used OEPA's Public Interest Center to promote SBAP through agency newsletters and for developing fact sheet layout and graphics.</p> <p>SBAP uses 5 district offices and 10 local air agencies to help distribute SBAP literature and to refer companies to SBAP. SBAP also has direct e-mail access to district office staff through a LAN network. SBAP established contacts in other OEPA divisions and programs to help with multimedia problems.</p> <p>SBAP established mutual referrals with OSHA on-site consultation program offered through the OH Bureau of Employment Services to help business bridge the gap between OSHA and EPA concerns.</p> <p>OEPA established a two-year pilot program for multi-media small business assistance, which covers a 10 county central Ohio district and is funded through a special appropriations bill. SBAP coordinated several multi-media site visits with this program and refers non-air questions to them. They refer all air questions to us. This program developed a newsletter, to which SBAP is a regular contributor of air articles. They formed an advisory group modeled after CAP and regularly attend CAP meetings. The program will continue through 1997, but future funding is uncertain.</p>	N/R
Oklahoma	<p>SBO and SBAP functions are a part of the Customer Assistance Program (CAP), which is a nonregulatory part of the agency providing multimedia assistance and advocacy.</p>	<p>SBO and SBAP functions are a part of the Customer Assistance Program (CAP), which is a nonregulatory part of the agency providing multimedia assistance and advocacy.</p>	<p>SBAP and SBO interact with the Panel on a regular basis. SBAP staff are very involved in identifying issues to bring before the Panel for their discussion and action.</p>

**TABLE E-13
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Oregon	SBO is located in the director's office. As a member of the upper management team, the SBO has direct access to the director, department heads, and other regulatory agencies. He is a lead member of the agency's Pollution Prevention Advisory Committee assigned the task of integrating and overseeing inter-program pollution prevention activities. He also serves as liaison to the CAP, SBAP, small business community, and general public on regulatory and P2 matters.	SBAP serves on several committees including a dry cleaner task force assigned to implement a new P2 and contaminated site clean up program, the Pollution Prevention Outreach Team, and the National and Regional Pollution Prevention Roundtables. Joint technical assistance visits are performed with RCRA and other agency staff. EPA-sponsored satellite teleconferences and educational videos produced by other state SBAPs are used to educate small businesses, trade groups, chemical and equipment vendors, environmental consultants, and other service providers. Partnerships have been formed with the small business development centers, trade groups, chemical vendors, equipment sales people and other service providers. These partnerships facilitate the transfer of regulatory and technical information to small businesses. SBAP and Pacific Northwest Pollution Prevention Resource Center have jointly developed technical information sheets and will soon publish a P2 reference manual for the printing industry. These and other printed materials soon will be posted on the Internet. SBAP uses training materials and publications produced by other SBAPs to transfer information to small businesses and their affiliates.	Special workshops are held as part of regularly scheduled meetings to inform small businesses about regulatory requirements that affect them. CAP and the Lane County Small Business Development Center are finalizing a 3-hour cross-media training course. A public information strategy is being developed to better utilize outside resources such as educational institutions, state and federal agencies, local governments, manufacturers, distributors, and consultants.
Pennsylvania	SBO Office funded by Department of Environmental Protection (DEP). SBO uses local service providers, which are funded by Department of Community and Economic Development. The ombudsman position currently is being relocated to DEP in the Office of Pollution Prevention and Compliance Assistance.	DEP has contracted many SBAP services to a private contractor. SBAP has received cooperation from trade associations, utilities, and district libraries in delivering services.	DEP provides administrative and technical support to the committee. CAP meetings are held in the Department's building.
Puerto Rico	Those expenses identified as travel, transportation, and seminars are reimbursed by Title V program.	Use of our Planning Division technical staff for small business assistance. Transportation, seminars, conferences paid by Title V fees.	Any expenses related with travel, transportation, etc. are reimbursed by Title V program.

**TABLE E-13
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Rhode Island	SBO funded entirely from state revenues not associated with the CAA program.	SBAP (1 FTE) integrated into Department's existing P2 program housed in the Office of Technical and Customer Assistance. 0.5 FTE (University of Rhode Island Research Associate) providing technical support to recently-hired FTE.	N/A
South Carolina	SBO provides multimedia assistance using resources in other program areas. Program also participates in Environmental Network Partnership, which includes representatives from other providers such as SBDC, Center for Waste Minimization, Center for Environmental Policy at University, MEP-sponsored programs, etc. Also have used student interns to help with special projects.	Program has regular access to technical persons in Bureau of Air Quality to assist on permitting issues. BAQ also provides computer air dispersion modeling at no charge to eligible small businesses.	SBO serves as secretariat to CAP.
South Dakota	SBO supervised by Secretary of the Department and has direct contact with the small business assistance program.	The individuals that work in the air program all contribute to the success of the SBAP.	CAP is made up of individuals from across SD. There is a good mixture of private individuals and small business owners.
Tennessee	SBO and SBAP work closely to support program activities.	All components of SBAP functions are handled by program staff. Some assistance is acquired through contract services of program's budget for site inspections and workshops.	N/A

**TABLE E-13
(Continued)**

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Texas	<p>Work with other state and federal agencies to get information to small waste hauling businesses. Four border workshops with Health Department, Texas Department of Transportation, Department of Public Safety, US Customs, EPA, US Department of Transportation, and Texas Workers Compensation.</p> <p>Five Small Business Advisory Committees (107 members) serve as a link between SBAP and the small businesses in their area.</p> <p>EnviroMentor (29 volunteers statewide) Program provides free onsite environmental compliance assistance to small businesses.</p> <p>Work with suppliers to sponsor workshops and distribute literature to small businesses. Work with TX Manufacturing Assistance Centers to deliver onsite assistance to small businesses. Work with SBDCs to develop videos, sponsor workshops, and conduct onsite visits for small businesses.</p>	See SBO.	Diverse membership from around the state.
Utah	<p>SBO Office met with each Division and received some support for cross referencing among Division services and Utah's small businesses. One Division created a brochure specifically designed to assist small businesses in becoming familiar with their services. One outcome of an internal Division committee was the regional award of the Small Business Leadership Grant, "Partnership for Compliance," which increases the "team" approach through outreach, networking, and P2 activities.</p>	<p>SBAP collaborates with Department's Pollution Prevention Program on P2 outreach projects and the development of a P2 training workshop for Division of Air Quality permit writers. SBAP referred small businesses with waste disposal issues to Division of Solid & Hazardous Waste's (DSHW) Small Quantity Generator Program for assistance. If a small business expresses concern about contacting other Divisions for assistance, SBAP has consulted with the appropriate Division and then relayed information to the business.</p>	<p>Small Business Advisory Committee has received support from existing division and department resources. The department's consulting organizational facilitator has spent many hours working with the Committee to establish working priorities and action plans. Division's Executive Director's Office has provided clerical support to prepare agendas, minutes, and work plans.</p>
Vermont	N/R	<p>The program is planning to get assistance from volunteer retired engineers in the future. The program also works with small business associations to help identify those businesses that need our assistance.</p>	N/R

TABLE E-13
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
Virginia	Utilizes experience and expertise of SBAP Director, other DEQ staff, contacts within SBDC network, Manufacturing Technology Centers, EPA and trade/business organizations to monitor the pulse of the small business community vis-a-vis air regulatory issues and impacts. When necessary, assistance in the form of resources are requested.	SBAP Director also is responsible for Air Division Air Toxics Program. Leveraging of 2 staff senior air toxic engineers for implementation of MACT provides the 0.3 FTE. Coordination and utilization of DEQ's Pollution Prevention, and Compliance & Enforcement Program resources also compliments SBAP activities. There also are SBAP Liaisons (permit engineers) in each of DEQ's regional offices, who function on an ad hoc, as needed basis for outreach, compliance assistance, etc. Their activity, having become more regular, is being calculated at 0.2 FTE for this reporting period. This Regional Office activity is not yet being tracked on a consistent basis, but planning is underway to recognize and report their activity. Additional resources often are sought from EPA regional and national offices. Coordination and utilization of resources from trade associations, SBDC network, and business groups provide a base of outreach support.	Compliance Advisory Board (CAB) has begun to review materials for lay understanding and will be providing input on a range of activities and priorities in the coming months. CAB has a wealth of expertise, ability, and contacts from both the public and private sectors, which will help to expand the resources of the SBAP.
Virgin Islands	Director of the VI Small Business Development Agency has been appointed to serve in the SBO function without additional compensation. His support staff may be compensated.	N/R	N/R
Washington	SBO is agency representative to Governor's Small Business Improvement Council composed of small business owners and various state agencies responsible for regulating the state's businesses. SBO is agency representative to Unified Business Identifier (UBI) Board composed of state and federal regulatory agencies impacting primarily small businesses.	SBAP supports and is supported by the following cooperative relationships: 1) Technical assistance staff for business-related pollution control/prevention exist in several other Ecology programs. 2) Outreach and assistance staff in four of state's seven local air authorities. 3) Moderate risk waste staff in the state's 39 counties.	One CAP member is the legislative liaison for Air Quality Program. All other CAP members are unpaid volunteers (per diem travel, lodging, and meals are reimbursed). Staff support provided by SBAP.

TABLE E-13
(Continued)

STATE OR TERRITORY	BRIEF DESCRIPTION OF HOW RESOURCES ARE LEVERAGED		
	SBO	SBAP	CAP
West Virginia	SBO works closely with SBAP personnel to evaluate technical aspects of small business issues. DEP personnel outside the air office are available for consultation. Resources outside the agency are consulted on specialty projects, generally at no cost or exchanged for in-kind services.	SBAP works with other air quality staff, when necessary, to evaluate permit and Title V applicability for small businesses. A significant number of clients are referred to SBAP through agency enforcement activities. Other DEP staff, especially Pollution Prevention (P2) Services, are available to help coordinate assistance to small businesses. SBAP also is coordinating its efforts with other outside assistance groups, including university and SBDC efforts. Trade organizations and state OSHA contacts provide additional assistance.	All members serve on a volunteer basis.
Wisconsin	Numerous public and private sector experts are called upon on an as-needed basis to provide assistance to SBO. Experts from the areas of development, finance, permit assistance, law, and environmental compliance/safety have provided suggestions and guidance.	Periodically, DNR personnel provide technical review of publications. These individuals review documents for completeness and accuracy, help formulate outreach strategy, and suggest work plans. SBAP members also provide guidance to and receive guidance from pollution prevention and Solid and Hazardous Waste Education Center personnel on outreach and publications. SBAP staff consult with private and public sector professionals as appropriate.	Personnel from SBAP coordinate meeting locations, develop agenda topics, and organize the bi-monthly CAP meetings. Other individuals from the WI Department of Natural Resources, WI Department of Commerce, and the University of Wisconsin Solid and Hazardous Waste Education Center advise the CAP on an as-needed basis.
Wyoming	One individual in the Department of Environmental Quality does SBP duties as about one-fifth of his job. Coverage is minimal, but linkage to other surrounding state programs is proving beneficial. Expanded outreach efforts are being planned and will be implemented in 1997.	SBAP leverages its resources by outreaching to affected sources through various trade associations and professional organizations. In addition, the SBAP has established an informational sharing relationship with other western states' SBAPs and uses their ideas and outreach materials. SBAP provides technical assistance to DEP's PPIS workshops and serves on the departmental P2 Committee. Finally, SBO and SBAP serve on the interagency committee chaired by the Secretary of State to improve services to the citizens.	The department plan calls for its other small business assistance programs to coordinate with the CAP and SBO as appropriate.

N/A Not applicable
N/R No response

TABLE E-14
SUMMARY: SBAP MECHANISMS FOR AVOIDING DUPLICATION AMONG SBTCPs

Program	Communication/ networking with SBTCP and state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBAP/SBO personnel within EPA region	Review of EPA documents/ contact with EPA	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources *
AL*						
AK	X	X	X	X	X	X
AZ				X	X	X
Maricopa Cty, AZ	X				X	
Pima Cty, AZ	X					
AR		X			X	
CA	X	X	X	X	X	X
SCAQMD, CA	X	X	X	X		
CO		X		X	X	X
CT	X		X		X	X
DE*						
DC					X	
FL					X	
GA	X			X	X	
HI					X	
ID		X			X	

TABLE E-14
(Continued)

Program	Communication/ networking with SBTCP and state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBAP/SBO personnel within EPA region	Review of EPA documents/ contact with EPA	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources "
IL		X		X		X
IN	X	X	X	X	X	X
IA					X	
KS	X	X			X	X
KY	X		X		X	X
Jeff. Cty., KY					X	
LA	X				X	
ME	X		X		X	X
MD		X				
MA	X					X
MI	X	X		X	X	
MN	X	X	X	X		
MS		X	X		X	
MO				X	X	
MT	X					
NE*						
NV	X	X	X		X	X

**TABLE E-14
(Continued)**

Program	Communication/ networking with SBTCP and state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBAP/SBO personnel within EPA region	Review of EPA documents/ contact with EPA	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources *
NJ		X				
NH	X	X	X	X	X	X
NM					X	
NY		X		X	X	
NC	X	X			X	
ND				X	X	
OH		X		X	X	
OK					X	
OR	X	X	X	X	X	X
PA					X	
PR	X	X	X		X	
RI	X	X	X	X	X	
SC			X	X	X	
SD		X		X		X
TN	X	X			X	X
TX	X	X	X	X	X	X
UT					X	

**TABLE E-14
(Continued)**

Program	Communication/ networking with SBTCP and state agency personnel via phone, mailing lists, etc.	Meetings, conference calls and other contacts with SBAP/SBO personnel within EPA region	Review of EPA documents/ contact with EPA	Networking through state or regional air group meetings such as WESTAR (Western States Air Resources)	Review of documents from other public, private, and/or university sources	Information gathering from electronic sources *
VT		X				
VA	X	X		X	X	
VI*						
WA				X	X	
WV		X		X	X	
WI		X		X	X	X
WY		X	X	X	X	
TOTAL	23/43%	30/57%	17/32%	25/47%	41/77%	18/34%

* See full response in following table.

a: Includes bulletin board services, web pages, and e-mail networks.

Total numbers represent activities offered by state programs or one of the reporting counties/agencies in the state.

**TABLE E-14
(Continued)**

SBAP MECHANISMS FOR AVOIDING DUPLICATION AMONG SBTCPs

PROGRAM	COMMENT RECEIVED
Alabama	No other SBTCPs exist in our state.
Alaska	<p>One of the advantages of having a Title V program be so far behind schedule is that the SBTCP has been able to use other states' information and have lead time to develop the program. Alaska sent out Florida and Washington states' dry cleaner manuals to local dry cleaners. The manuals have not been changed, rather provided as written. It is explained that the laws may not be identical, however, the issues that are covered will be the same for a dry cleaner in Alaska or in Washington or Florida. This has allowed dry cleaners to evaluate the regulatory requirements and their compliance.</p> <p>SBAP also modified the Iowa Waste Reduction Center's check list for dry cleaners for use in Alaska. Having it in electronic form made it very easy to insert the contacts for Alaska.</p> <p>At the last SBO/SBAP national conference, substantial materials were available that we were able to use in developing our SBAP general brochure. Other material was useful for becoming familiar with various industries. All material obtained now is located in our CAO's library.</p> <p>The other source of information that has been widely used is EPA's TTN Bulletin Board for SBAPs. We have downloaded material developed by EPA and obtained information from other states that was not downloadable from the BBS.</p> <p>Currently, Region X states SBAPs have a contract with the Pollution Prevention Resource Center (PPRC) to develop factsheets for small businesses. These factsheets are developed so that each state can add the local contact information. Forms also are sent out electronically so states can add or subtract information if they wish.</p> <p>The western states, through WESTAR, have teleconferences to keep the others updated on what they are doing. These are a great way to determine what new materials are available. SBAP material has been shared routinely among the WESTAR SBAPs based on discussions during the teleconference.</p>
Arizona	States are keeping much better contact with each other now, and are reaching out to other state agencies to share information. With the popularity of the Internet and the prospect of pollution prevention hubs that will serve as clearinghouses for information, it is much more likely that someone has developed something that we can use as a basis for our products. We currently contact other states and research their information and products prior to developing our own.
Maricopa Cty	I am always networking with other state programs for information from South Coast, Washington State, South Carolina, Texas, and Connecticut, etc.

TABLE E-14
(Continued)

PROGRAM	COMMENT RECEIVED
Pima Cty	Continual communications between Pima County program and AZ DEQ, Maricopa Department of Environmental Services, and Pinal County Air Quality Control District ensure minimization of duplicative efforts. Traditionally, brochures and factsheets have been developed by Pima DEQ and adapted for use by other programs.
Arkansas	Have a good knowledge of efforts made by other states through newsletters, annual reports, and telephone conversations. Will contact Oklahoma to participate in compliance audits for the foundry and die casters in Arkansas. Have contacted other states for case study information
California	We review other state brochures and web sites for adaptability. We also make available to other states relevant materials. We adapted a CA Business Association brochure as a part of one of ours.
SCAQMD	SCAQMD Small Business office staff attends the State Small Business Ombudsman/Small Business Assistance Program conferences that are offered by other agencies and maintains contact with other business assistance programs, both state- and nation-wide to stay abreast of the latest developments.
Colorado	Information and ideas are shared at bi-monthly conference calls held with other western region state SBO/SBAPs. Joint projects are discussed and assignments made for obtaining needed information. Currently, the group is exploring avenues to finance a joint conference for the western state SBO/SBAP staff. Information also is shared through the Internet. The CO SBO/SBAP researches other states' written materials when creating a brochure or guide for small businesses.
Connecticut	<p>CT continues to utilize materials developed by other states and EPA. The materials developed by the University of Tennessee as part of the satellite teleconferences have been extremely helpful. Many of the materials developed by Texas, California, Iowa, and North Carolina have been made available in formats that make information transfer very easy. The Small Business Bulletin Board system and the materials provided by Karen Brown, the EPA Small Business Ombudsman, have been utilized to promote the sharing and exchanging of information.</p> <p>Within CT, monthly exchanges occur through the Bureau's State Implementation Plan Revision Advisory Committee (SIPRAC), which helps to promote information exchange and awareness and to avoid duplication. Monthly meeting announcements and informational materials are mailed to about 350 members. The organization is chaired by the SBO, an industry representative and a representative of the environmental community.</p> <p>CT SBAP will provide informational materials to the small business community from other programs within the state providing relevant services. The focus has been in trying to establish a network of service providers with each delivering specialized expertise. Improving communication and coordination will continue to be a major focus in 1997.</p>
Delaware	Not a problem.
District of Columbia	We used other states' brochures to develop a factsheet for our small businesses.

TABLE E-14
(Continued)

PROGRAM	COMMENT RECEIVED
Florida	We have found California's information for motor vehicles and related material to be applicable to Florida's air program.
Georgia	Georgia participates in regional conference calls and shares information such as factsheets, permit cover letters, etc. Georgia has responded via e-mail to Iowa, Texas, Nebraska, and other states on permitting and pollution prevention issues. Georgia contacted Massachusetts and Illinois to request copies of materials prepared for their printing workshops. Georgia contacted Iowa, California, and Texas about developing a customer survey form.
Hawaii	Air program has inquired and received information from several SBTCs. Air program will continue to request and evaluate material for incorporation into own SBTCP.
Idaho	By working through Leadership Grant with Washington, Oregon, and Alaska, the Region 10 states developed several factsheets in cooperation with the Northwest Pollution Prevention Center.
Illinois	Quarterly Region V conference calls. An annual meeting in Chicago in July. Gather at the national annual conference. Communicate with one another electronically.
Indiana	Participates in quarterly conference calls with other Region V SBAP programs to share information. Program documents are sent to other states upon request. Documents regarding mercury, dry cleaners, and the mineral aggregate industry are automatically sent to all other Region V SBAPs. Indiana developed a dry cleaner brochure, manual, and 5-Star recognition program that several other states, including Illinois and Wisconsin, are using with little or no editing. Communicates with other SBAPs to request information or leads to find information (calls, letters, electronic mail). Reviews EPA documents and contacts EPA for information. Reviews documents created by other sources (Solid Waste Management Districts, local pollution control or health agencies, private organizations, other state agencies). Gathers information from electronic sources (this mode of gathering information is limited, as most of Indiana's SBAP staff does not have Internet access).
Iowa	IWRC produces the Small Business Assistance Program (SBAP) resource guide, which is updated annually and distributed at national conferences. The guide lists available resource material and assistance tools (with brief descriptions) from other states. Whenever possible, IAEAP refers to this guide to avoid duplication.
Kansas	SBEAP personnel attend trade, professional, and regional/national pollution prevention and small business meetings. This allows us to keep abreast of work in other states and obtain resources. Whenever possible, we will also request and use materials from other states and EPA. Specific examples include the wood furniture MACT (Tennessee) and printer's pollution prevention (Wisconsin) teleconferences that we downlinked. We also share our information with other states at their request. Specific examples include our Airlines newsletter, the Environmentally Conscious Painting Manual, provide spaces for participants from adjoining states at teleconference downlink sites, and the 112(r) publication. The 112(r) publication was used at a MO Department of Natural Resources workshop and also was distributed at the most recent EPA Region VII P2 Roundtable meeting.

TABLE E-14
(Continued)

PROGRAM	COMMENT RECEIVED
Kentucky	KBEAP uses EPA and other state-developed material on federal regulatory issues. SBO reviews newsletters from other states for ideas. Information packets from EPA Ombudsman are a valuable source of information on small business assistance activities. SBO also reviews Internet information. This year, time was spent on preparation of a new regulation format to incorporate user-friendly features rather than development of publications. Contact people and examples of user-friendly regulations were located through the SBO network.
Jefferson County	A self-auditing manual for body shops currently is being written based largely on one developed in California.
Louisiana	We exchange brochures, and miscellaneous literature with many states. We have used them as a guide to prepare our literature. For example, we used the wood furniture reporting forms from another state as a guide to prepare a similar form. SBAP Project Manager serves on a DEQ task force whose objective is to coordinate all outreach programs within the agency.
Maine	We are on the mailing list for many state programs and get brochures and documents from other programs. We sometimes use this information in our own newsletters and to stock our library. We rely on EPA Ombudsman office to distribute useful information from other states. SBTAP also is a subscriber to P2 Tech Bulletin Board, which is accessed by many state SBAPs.
Maryland	Maryland's SBAP limits its efforts to providing state-specific regulatory assistance to Maryland businesses, which cannot be a duplication of other state's efforts. SBAP regularly communicates with EPA Region III to avoid duplication of effort concerning federal MACT rules.
Massachusetts	We communicate with other SBAPs and, as time allows, try to check TTN and other EPA home page information to see what's being developed and put in practice in other states.
Michigan	Michigan tries to maintain contact with its EPA Region V SBAP counterparts in an effort to update and exchange information on each state's upcoming SBAP activities. Initially, Michigan suggested the best way to avoid duplication of efforts and for timely updates of states' activities was through quarterly conference calls with the EPA Region V states and a Region V EPA representative. Additionally, as projects are developed, Michigan SBAP staff call other states to talk with staff who have completed certain guidance documents for or presented certain types of workshops to state facilities.
Minnesota	Region V quarterly conference calls. Annual Region V SBAP meeting. National SBO/SBAP conference. Personal communications network with colleagues. EPA information packets from Karen Brown's office.
Mississippi	SBO office communicates with national SBO on planned projects. During these communications, information is obtained as to whether or not any other states have conducted the same projects. Mississippi used information from other states in presenting several auto body workshops this year.

**TABLE E-14
(Continued)**

PROGRAM	COMMENT RECEIVED
Missouri	Region VII states share information readily and utilize each other's findings. Articles are often used for our newsletter, "TAP into DNR."
Montana	SBO/SBAP met twice with other assistance providers in statewide "roundtables" to help each program understand the types of assistance that are being provided. MT SBO completed a statewide directory of these services for distribution.
Nebraska	There is no other SBAP in the State of Nebraska.
Nevada	<p>SBO and SBAP attended two annual SBTCP meetings (San Diego, CA and Charleston, SC) to get information on what other state programs have developed. This office also continues to gather information from other state programs. SBO and SBAP continually gather information from the various US EPA and other federal agency bulletin boards, both electronically and through the mail.</p> <p>The Washoe County AWMD was established as a separate regulatory entity by the state legislature and operates on the same level as the state air quality regulatory agency. However, there is good cooperation between WCAQMD and NDEP in referring people to the correct agency. Although within the county, there are two incorporated municipalities (Reno and Sparks), the air district encompasses the entire county and therefore, there is no duplication of administration.</p> <p>The Clark County Air Pollution Control Division (CCAPCD) does not have a formal program to prevent duplication. However, like Washoe County, they are a regional air district, which would avoid duplication of air quality administration. CCAPCD suggested that the CAP be utilized to avoid duplication among all air agencies providing assistance.</p> <p>State BAQ – Because the county air agencies have their own air regulations and different mechanisms for enforcement, no attempt has been made to coordinate compliance workshops. Other air quality issues, such as mobile sources and Title V permitting, have been coordinated with the county air agencies.</p> <p>BEP attempts to avoid duplication through coordination and communication of activities. Materials developed by other state and local programs and EPA are used to develop training and informational materials.</p>
New Hampshire	Network with other SBAPs to see what is being developed elsewhere that could be modified for use in NH. Informal contact with regional SBAPs for potential joint ventures for cross state border issues. Actively participate in regionally based organizations (NEWMOA and EPA Region I) for coordination of effort. Review available assistance literature from a wide variety of sources (internet, workgroups, EPA, etc.).
New Jersey	SBAP has contacted 20-30 states for the purpose of information exchange.

TABLE E-14
(Continued)

PROGRAM	COMMENT RECEIVED
New Mexico	Any time new materials are being developed, we check our library and our contacts in other parts of the country to see if they have any current publications that we could use instead of "reinventing the wheel." For example: Iowa Waste Reduction Center – Information in automotive manual was used to develop a set of automotive posters and a P2 manual (completed under US EPA Leadership Grant for TX, OK, and NM). Illinois, Massachusetts, and EPA – Printers manuals were used to develop Environmental Management Tools to fulfill grant along with TX and OK.
New York	Informal and formal communications among states. Information exchanges at conferences. Information from PA, TX, and CA was adapted for inclusion in 3 New York state environmental compliance guides (for Surface Coaters, Gasoline Transporters and Dispensers, and Graphic Arts). New York's "Environmental Self-Audit for Small Business" has been adapted by several states.
North Carolina	SBO/SBAP annual conference provides both a forum and contacts that help with this. Contact by telephone with a number of our counterparts also helps. Newsletters and brochures are received from a few of our peers. Many ideas have been received from other states and we are in the process of developing several fact sheets and a new brochure. In North Carolina, the SBO is part of a Small Business Partnership Group that includes SBTDC, university, and other partners. The purpose of this group is to coordinate activities and avoid duplication.
North Dakota	We receive newsletters from several state SBTCPs. Since we only have 0.50 FTEs committed to small business assistance, it is important for us to capitalize on the successes of and information available from larger SBTCPs. Also, WESTAR and EPA Region VIII states have conference calls among the state SBAPs and SBOs where the states discuss and exchange ideas.
Ohio	SBAP participates in an annual two-day conference with Region V states, usually held in August. The purpose of this is to share information, literature, and outreach activities with the other state programs. The SBAP has solicited input from other states on CAP functions, budgets, and customer satisfaction surveys. SBAP aided three other states in developing confidentiality legislation and/or policy for their SBAP. SBAP is developing a customer satisfaction survey modeled after Minnesota's and has solicited other states' RACT rules for printing to develop new OEPA permitting guidance for small printing companies.
Oklahoma	OK SBAP has, to a certain extent, made use of information regarding compliance issues for small businesses produced by other states. However, because our air quality rules are different than those in other states, the sharing of such information is limited. We do, at times, adapt for our own uses those ideas/products that other states have produced. This often decreases the amount of work we have to do in regard to developing such information.

TABLE E-14
(Continued)

PROGRAM	COMMENT RECEIVED
Oregon	<p>OR SBAP, because of its very limited resources, is limited in its ability to develop informational documents. Thus, a variety of documents published by other SBAPs and other resources such as EPA, the Pollution Prevention Resource Center in Seattle, the Pollution Prevention Outreach Team, the Universities of Tennessee, Minnesota, Iowa, etc. are used to transfer information to small businesses, their service providers, and the public. In Region X, SBAPs are funding a full time position at the Pollution Prevention Resource Center to do special projects. During 1996, the PPRC published fact sheets on halogenated solvent cleaning, calculating air emissions using information contained on MSDS sheets, chrome plating, and accidental release prevention. Publication of cross-media P2 guidance book for printing and publishing, auto repair and finishing, wood furniture manufacturing, metal finishing, and spray applications are pending. SBAP, EPA, and other materials posted on the Internet are accessed frequently. The 15 member WESTAR SBAPs meet via telephone conferences every other month and exchange ideas and written information. Fact sheets also are collected at the annual SBO/SBAP conferences and added to OR's information library. SBAP maintains a video film library containing teleconferences on painting, dry cleaning, chrome plating, wood furniture manufacturing, halogenated solvents, and other subjects. OR SBAP plans on using the wood furniture coating coursebook and videos developed by the MN SBAP at a future workshop(s). English and Korean translations of dry cleaner publications published by the CA Resources Board have been used, among others.</p>
Pennsylvania	<p>Information from other states, such as fact sheets, brochures, and newsletters, is reviewed. To date, no information from other states has been used with minimal editing in the Pennsylvania SBAP.</p>
Puerto Rico	<p>We use copies of the "comic books" developed by California to help small businesses understand the regulations, recordkeeping, etc. and to provide ideas for P2. They have been very helpful to us, especially the ones that are in Spanish, since we don't have the means for translation of the rules. We use plenty of the information our SBAP staff brings from the SBO/SBAP annual conference. Throughout the year, our SBAP staff makes phone calls to other states to clear doubts on different matters. We also share many ideas and exchange information with other states.</p>
Rhode Island	<p>Each year, RI DEM SBAP staff attend national EPA-sponsored conferences on SBO/SBAP/CAA. Information obtained at these meetings and through other means is extremely useful and is reviewed for incorporation into RI DEM fact sheets and information packets. RI shares all of its technical information and fact sheets whenever requested. RI frequently uses other states' materials when developing its own. RI DEM is active in the Northeast Waste Management Officials Association, NE States Pollution Prevention Roundtable, and shares information with other New England states on SBO and SBAP activities.</p>
South Carolina	<p>Networking with other SBAPs via phone, mailing lists, etc. Review of EPA documents. SC has adapted guidebooks developed by Texas and Iowa for use in our state. We also have used information provided in newsletters of several states.</p>
South Dakota	<p>South Dakota avoids duplication through national small business meeting. WESTAR also has been very helpful in getting individuals that work in the small business program together to exchange ideas. WESTAR has a bulletin board, which the members have decided to use to exchange ideas.</p>

**TABLE E-14
(Continued)**

PROGRAM	COMMENT RECEIVED
Tennessee	Texas Independent Small Business Marketer of Gasoline Determination form. Minnesota Accident Release Prevention information sheet. Oklahoma loan workshop modeled. Information is collected from national meetings, bulletin boards/web pages. Information is researched and states are phoned before projects are initiated.
Texas	Michigan requested information from Texas on the wood products industry. Washington requested information on the printing industry. Utah requested information on the auto body industry. Texas requested information from California on their amnesty programs, but developed our own materials. We share information with other states through an electronic e-mail network that the Iowa Governor's Office set up.
Utah	WY Pollution Prevention Program: "MSDS Fact Sheet." MN Technical Assistance Program: "Alternative Cleaning Technologies for Vapor Degreasing and Cold Dip Process" and "Reducing Solvent Emissions from Vapor Degreasers." CO Air Pollution Control Division: "Emissions for APEN Reporting, Solvent Users," "Emissions for APEN Reporting, Printers," and "Emissions for APEN Reporting, Automotive Paint Booths."
Vermont	By communicating with other programs on a regular basis.
Virginia	Communication with other states to identify materials developed and programs that were successful is a course of business for the VA SBAP. With the reduction in financial resources, we must leverage as much and as many resources as possible. To that end, the utilization of the SBO/SBAP national steering committee has provided an increased avenue of resources and material identification. Over the reporting period, a large number of other state programs have been contacted and, where possible, materials have been used with minimal editing in VA. Activity to thwart duplication of effort is a prime concern not only at the state level, but at EPA regional and national.
Virgin Islands	N/A
Washington	Have periodic meetings with other Region X SBAPs and participate in WESTAR's (Western States Air Resources) SBAP group. Exchange relevant publications with other states.
West Virginia	We continue to work with surrounding states in reviewing outreach and workshop materials. We coordinated with Utah on the wood finishing teleconference. Shared chrome information with adjoining states and acted as a resource on the NSW NSPS for other states. Participated in regional and national conferences.
Wisconsin	We regularly maintain contact with other SBAPs in EPA Region V to ensure the most efficient possible use of materials, including: participating in quarterly conference calls with Region V states to share information and publications; attending annual Region V meetings and information exchanges; making electronic information exchanges with other states on a routine and nationwide basis; developing professional relationships between state programs sharing information via Internet; exchanging fact sheets and brochures; and developing cross border seminars on shared environmental concerns.

TABLE E-14
(Continued)

PROGRAM	COMMENT RECEIVED
Wyoming	WY SBAP has established oral and written information exchange with a number of regional states' SBAPs and SBOs to decrease duplication of efforts. In addition, the SBAP coordinates its program with EPA Region VIII. The WESTAR states SBAPs and SBOs try to meet annually to maximize each state's resources and to further develop their information exchange network.

**TABLE E-15
SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS
OF THE PAPERWORK REDUCTION ACT**

Program	Routine review of SBTCP documents for compliance	Receiving / providing information electronically	Simplified / consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Concise easy- to-read summary documents	Other (See below)
AL	N/R						
AK	X	X	X				
AZ		X					
Maricopa		X					
Pima	None						
AR						X	
CA		X				X	
SCAQMD		X					
CO	X						
CT			X	X	X		X
DE						X	
DC	N/A						
FL	N/A						
GA			X				
HI	N/A						
ID	N/A						
IL	N/A						
IN		X	X	X	X	X	

TABLE E-15
(Continued)

Program	Routine review of SBTCP documents for compliance	Receiving / providing information electronically	Simplified / consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Concise easy-to-read summary documents	Other (See below)
IA	N/A						
KS	N/A						
KY							X
Jefferson	See KY						
LA		X	X			X	
ME	X						
MD	N/A						
MA			X		X	X	
MI							X
MN							X
MS	X						
MO		X					X
MT	X						
NE	N/R						
NV	N/A						
NJ	N/R						
NH				X	X	X	
NM		X					X

TABLE E-15
(Continued)

Program	Routine review of SBTCP documents for compliance	Receiving / providing information electronically	Simplified / consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Concise easy-to-read summary documents	Other (See below)
NY						X	
NC	X		X	X	X		
ND							
OH	N/A						
OK							X
OR				X			X
PA	N/R						
PR	N/A						
RI	N/A						
SC	X	X			X		
SD			X				
TN	N/A						
TX	X	X	X	X	X	X	
UT	X						
VT	N/A						
VA		X	X		X		
VI	N/A						
WA	X						

**TABLE E-15
(Continued)**

Program	Routine review of SBTCP documents for compliance	Receiving / providing information electronically	Simplified / consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions	General permits for certain types of industries	Concise easy-to-read summary documents	Other (See below)
WV			X		X		
WI	X	X				X	
WY	N/A						
TOTAL	11/21%	11/21%	12/23%	6/11%	9/17%	10/19%	8/15%

Other Actions:

- CT** SBAP, in conjunction with the Department of Revenue Services, developed a simplified process for applicants for reviews of requests for tax credits and exemptions for air pollution control equipment.
- KY** Role in development of new regulation format to incorporate user-friendly features.
- MA** Reduce and recycle paper where possible.
- MN** Various efforts to condense, streamline, and reduce volume of paper associated with regulations.
- MO** One-on-one technical assistance for small business to reduce small businesses' time in reading and interpreting regulations.
- NM** Doublesided printing, waste paper used as scrap, all paper recycled.
- OK** Developing new permitting approach/philosophy requiring a more common sense approach to regulations.
- OR** Non-major PTE Title V permits deferred to July 1998.

TABLE E-15
(Continued)

**SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS
OF THE PAPERWORK REDUCTION, REGULATORY FLEXIBILITY, AND EQUAL ACCESS TO JUSTICE ACTS**

Program	Comment Received
Alabama	N/R
Alaska	No actions taken per se. All materials prepared by the SBTCP are evaluated prior to distribution and, wherever possible, electronic versions are provided. The SBTCP evaluates materials from the Air Program and makes recommendations for streamlining or simplifying permit materials for use by small businesses. The SBTCP is evaluating, in conjunction with other Department programs, the various opportunities for regulatory flexibility and developing incentives for compliance to promote environmental excellence.
Arizona	<p>CAP has not met to date, but the SBAP is participating or leading many efforts to follow these Acts. SBAP is participating on a Public Participation Committee that is evaluating how to more effectively reach out to constituents by alternative methods, such as e-mail or the Internet.</p> <p>SB0/SBAP is serving as project manager for the agency web page, which can alleviate a great deal of paperwork. The agency hopes to provide permit applications, frequently requested reports, guidance documents, rule notices, and finalized rules.</p> <p>SBAP continues to work within the agency to provide regulatory flexibility for businesses that have a proven history of environmental compliance. SBAP has just applied for a grant from EPA Office of Water to set up pilot projects to investigate regulatory flexibility for businesses implementing an environmental management system. The grant will be awarded to successful applicants in April.</p>
Maricopa Cty	SBEAP has a great new home page. It contains information about programs, industries that probably need a permit, calendar with workshops/events, P2 information, enforcement procedures, emission inventory, rules, and regulations. Most, if not all, are intention of Paperwork Reduction Act and other federal acts.
Pima Cty	No particular changes to existing program.
Arkansas	<p>A major work element with SBAP is the interpretation of National Air Emission Standards and the publication of regulatory documents that are more user friendly. This will continue to be a major work effort in both air and water.</p> <p>In response to the principles set forth in the Equal Access to Justice Act, SBAP has provided technical support to several public groups aggrieved by permit actions of the regulatory agency. Primarily, these activities have centered on land application of municipal sewage waste, corporate hog farming, and groundwater contamination from solid waste landfill. Funds have been made available from the Department to employ engineering support to citizen groups. This has been a very interesting facet to SBAP.</p>

TABLE E-15
(Continued)

Program	Comment Received
California	Governor Pete Wilson is leading a comprehensive streamlining and regulatory reduction program. In an effort to further the intent of the Equal Access to Justice Act, ARB provides in its administrative proceedings a full and fair opportunity for parties to present their claims. An example is our Heavy-duty Vehicle Inspection Program hearings.
SCAQMD	SCAQMD is a regional regulatory agency and is not required to have a CAP. However, a CAP-like Local Government and Small Business Committee is being formed. SBAP has made information and forms available on the Internet. The agency is piloting a program to allow permits to be submitted electronically. Permit and other AQMD information are available in multiple languages.
Colorado	SBO/SBAP continue to review air regulatory rules and permit applications to assure they are not overly burdensome to small businesses.

**TABLE E-15
(Continued)**

Program	Comment Received
Connecticut	<p>Paperwork Reduction Act: 1) CT SBAP has been an advocate for a number of regulatory streamlining efforts including recordkeeping and reporting requirements for DEP's air quality regulations. Many of these efforts have centered on the implementation of new programs such as Title V. More effort has been focused on reducing the number of application forms that need to be completed as well as an attempt to eliminate any redundant forms or requests for information. 2) SBAP participated in the development of a general permit for small businesses to opt out of the full Title V program. The development of the FAST Vs Program has encouraged a wholesale reevaluation of permitting processes. Areas of focus have included simplifying recordkeeping requirements, eliminating redundancies, and evaluating areas where reporting requirements can be eliminated or consolidated. 3) SBAP, along with the Air Bureau's Permitting Section, have been actively involved in the development of general permits for small sources subject to New Source review requirements. General permits have been issued for minor sources under Title V, emergency engines, automotive refinishing, and surface coating. A general permit for small boilers is still under development. The general permits already adopted eliminate the need for individual reviews and provide a simple, streamlined application process. For facilities covered under one of these general permits, recordkeeping and reporting requirements will be significantly reduced. 4) SBAP, in conjunction with Department of Revenue Services, developed a simplified process for applicants for reviews of requests for tax credits and exemptions for air pollution control equipment.</p> <p>Regulatory Flexibility Act: To minimize the sometimes disproportionate regulatory burdens imposed on small businesses, CT SBAP implemented several initiatives to help promote cost effective environmental regulation. 1) FAST Vs (Fundamental Assistance for Small Title V Sources) represents a "back to basics" approach to air quality permitting. FAST Vs will be offered as part of an intensive year long effort to provide hands-on permitting assistance to small businesses. Small workshops currently are being held in locations around the state and will provide hands on instruction on how to calculate the potential and actual emissions as well as how to complete the General Permit to Limit Potential to Emit (GPLPE) registration form. A facility training model will be used to provide attendees with suggestions on how to address Title V requirements for their facility. 2) Compliance Assurance Initiative for Autobody Shops was developed to provide on-site compliance assistance to auto body shops in CT. The program was designed to provide intensive, targeted compliance assistance to small shops within the state to raise awareness about impending Title V requirements and to provide technical assistance on simple streamlined permitting options to meet air quality requirements. This effort, in many cases, provides auto body shops with access to information and eliminates costly permit applications and fees for preparation. 3) Review and comment on all new air quality regulations to provide input on small business impacts. 4) Worked on general changes to the</p>

TABLE E-15
(Continued)

Program	Comment Received
Connecticut (cont.)	<p>fee regulation for air emissions. The fee regulation, which recently has been adopted, implements several reductions in fees for small businesses and eliminates emission-based fees for some general permits.</p> <p>Equal Access to Justice Act: In an effort to provide a forum for small businesses to participate in the Department's regulatory process, the CT SBO has been appointed as co-chair of the Air Bureau's Clean Air Act Advisory Committee. The Committee meets monthly and provides members with updates on new regulatory requirements and technical assistance. CAP has established several subcommittees dedicated to specific small business sectors. Stakeholder involvement is initiated as part of the regulatory development process as part of a large Air Advisory Group as well as part of the CAP.</p>
Delaware	<p>Every attempt is made to provide assistance in clear and simple plain English and to avoid excessive technical terms. When technical information is referenced or needs to be reported by a small business, the reason is clearly explained as well as why it is necessary to provide such information.</p>
District of Columbia	N/A
Florida	N/A
Georgia	<p>Paperwork Reduction Act: SBAP requested that the Air Toxics Unit streamline the information requested from small businesses subject to the Wood Furniture and Printing and Publishing MACT standards. The Air Toxics Unit incorporated our suggestions and allowed the aforementioned industries to notify the Division and apply for a permit using the same form.</p> <p>Regulatory Flexibility Act: Ombudsman prepares an impact statement of each proposed rule and its effect on the small business community before a rule is adopted by the state. The report is available for the CAP to review.</p> <p>Equal Access to Justice Act: Not an issue in 1996.</p>
Hawaii	N/A
Idaho	None this year.
Illinois	N/A

**TABLE E-15
(Continued)**

Program	Comment Received
Indiana	<p>Paperwork Reduction Act: General – 1) Providing documents electronically via the FaxBack system. 2) Allowing customers to call and receive pre-recorded information via Custom Connect, a service offered by the local telephone company. 3) Creating an Internet site to allow customers to access information electronically. 4) Producing concise, easy-to-read documents to assist customers in understanding and complying with environmental requirements. Some of these documents include compliance manuals targeted to specific industries, guidance documents, and brochures and flyers. 5) Removing obstacles to compliance by providing on-site assistance, phone assistance, workshops, and the above mentioned documents.</p> <p>Title V – 1) Meeting with Clean Air Act Advisory Committee (comprised of interested parties, including the regulated community, consultants, associations, etc.) to discuss Title V implementation and permitting issues. 2) Forming various industry workgroups to obtain input on Title V compliance monitoring requirements for each industry. 3) Increasing the number of tiers under IN's Title V program (from 3 to 4) to offer businesses a more appropriate permit for emissions, fees, and time required to complete the application. 4) Increasing the number of Source Specific Operating Agreements offered in the Title V program so that more types of small businesses could take advantage of this permitting mechanism. 5) Developing a permit-by-rule permitting mechanism to allow businesses with very low emissions to avoid the need for a Title V permit. 6) Working with industry sectors to develop the SSOA programs so that industry could give input into the programs. 7) Creating simplified permit applications and record keeping requirements for SSOA and permit-by-rule sources. 8) Facilitating reduced permitting fees for SSOA and permit-by-rule sources. 9) Providing businesses with electronic applications (although submitted applications must be in hard copy form due to the agency's computer limitations). 10) Increasing the number of insignificant activities under the Title V program.</p> <p>Hazardous Waste – 1) Meeting with Hazardous Waste Advisory Workgroup (comprised of interested parties including the regulated community, hazardous waste haulers, treatment facilities, environmentalists, associations, etc.) to discuss issues impacting the regulated community. 2) Working with the Office of Solid and Hazardous Waste Management (OSHW) to assist them in preparing to conduct a series of visits (informal inspections) to vehicle maintenance shops. Worked with OSHWM and Automotive Services Association of Indiana to inform shops of upcoming visits, the intent of the visit, and what to expect.</p>
Indiana (cont.)	<p>Regulatory Flexibility Act: 1) Allowing companies in violation of environmental rules to participate in supplemental environmental projects (SEPs), thereby allowing companies to make environmental improvements while reducing their penalties. 2) See above information regarding Title V permitting options, fees, and recordkeeping requirements. 3) See above information regarding the Hazardous Waste Advisory Workgroup.</p>
Iowa	CAP is not operational yet. Pending Governor's appointment.
Kansas	CAP is to be trained by KDHE's staff attorney at the 2/20/97 CAP meeting. No specific actions regarding these acts were taken by the CAP in 1996.

TABLE E-15
(Continued)

Program	Comment Received
Kentucky	SBO, SBAP, and CAP had roles in the development of a new regulation format to incorporate user friendly features. This project supports the intent of the Paperwork Reduction Act and the Regulatory Flexibility Act. SBO talked to the Agency minority recruitment person on methods of increasing outreach, which lays the groundwork for complying with the Equal Access to Justice Act.
Jefferson Cty	See Kentucky response.
Louisiana	SBAP created an Internet home page to disseminate information and reduce paperwork. Forms that are sent to small businesses are kept as brief as possible. We have had no occasion to use the Regulatory Flexibility and Equal Access to Justice Acts. SBAP prepared summaries of these three acts that will be included in the packets for the new CAP members.
Maine	CAP routinely reviews documents of the SBTAP.
Maryland	None.
Massachusetts	<p>A good example of the attention to both Paperwork Reduction Act and SBREFA is demonstrated by the MA Printers Partnership (MP2) program. This program was a joint effort of OTA (SBAP), MA/DEP, US EPA Region I, Printing Industries of New England, printers, vendors, and consultants designed to significantly simplify compliance issues for printing firms throughout the state and (nearly completely) across industry sectors. The program workbook approached the printing process from a multimedia (M2) perspective and summarized all applicable regulations. The workbook consists of three sections: Section I (24 pages) explaining regulatory requirements as they relate to printing, by process; Section II (36 questions and related explanations), which comprise the self-certification portion; and the Appendices, which include statewide information of POTWs, sample signs and postings for hazardous waste areas, background data on hazardous wastes, Hazardous Air Pollutants, etc. The program replaced the facility's requirement to obtain non-major air permits, industrial wastewater permits, Class A Recycling Permits, and the annual compliance fees for each of these programs. Eight workshops were conducted throughout the state, and six hands-on clinics were held to answer specific questions about Partnership requirements and process implementation.</p> <p>Several mailings were conducted to the entire printing community of 1,500 printers statewide, and combined attendance at workshops approached 600. The clinics attracted 44 people for hands-on assistance. 435 companies joined the program by the certification deadline of 7/1/96. Although the decision was made to allow companies to continue to join the Partnership program at double the regular fee (still less costly than the cost of permits and fees), this action was not widely broadcast, and the result was small.</p> <p>We are collaborating with MA DEP in the design/implementation of the state's Environmental Results Program (ERP) for the printing industry, which will convert the voluntary pilot program to a regulatory structure. All printers in specified sectors who are not major sources of air emissions, not Significant Industrial Users (water), and not required to file SARA TRI or MA/TURA will be required to participate. Program is scheduled to open the self-certification period from 7/1/97 to 8/31/97.</p>

TABLE E-15
(Continued)

Program	Comment Received
Michigan	<p>Paperwork Reduction Act: Michigan's SBTCP is in on-going compliance with Michigan's "Management and Budget Act (PA 431 of 1984)," which required all state agencies to reduce and recycle paper whenever possible. The Act is modeled after the "Federal Paperwork Reduction Act."</p> <p>Regulatory Flexibility Act: No actions were initiated by SBTCP under this Act.</p> <p>Equal Access to Justice Act: No actions were initiated by SBTCP under this Act.</p>
Minnesota	<p>Many efforts to condense, streamline, and reduce volume of paper associated with regulations. Wood Finishing Enforcement Waiver for administrative violations to get businesses into the system. Seek comments and concerns from small businesses for better ways to assist them and also encourage and help them to comment on new rules and policies during development.</p>
Mississippi	<p>Ombudsman and SBAP keep small businesses aware of these Acts and how they are affected by them. CAP reviews the newsletters and other materials designed to comply with these Acts.</p>
Missouri	<p>Paperwork Reduction Act: The Department of Natural Resources Technical Assistance Program transmits documentation via electronic media whenever possible. Much of the assistance we provide is report and permit preparation and guidance in a one-on-one setting to help Missouri businesses understand the requirements without having to spend time reading all of the regulations and figuring it out on their own.</p> <p>Equal Access to Justice Act: While not necessarily a component of this Act, we are targeting small businesses that may be the least capable of having the capital or human resources to allow them to comply with the Clean Air Act requirements.</p>
Montana	<p>CAP review of all SBO/SBAP publications and productions.</p>
Nebraska	<p>N/R</p>
Nevada	<p>CAP was made aware of the provisions of these various federal laws. CAP has not the opportunity to provide other than minimal advice to SBTCP on actions that will meet the letter of each of these laws.</p>

TABLE E-15
(Continued)

Program	Comment Received
New Hampshire	<p>Paperwork Reduction Act: Support for DES efforts to implement general permits (permits by rule). Reduction in permit application requirements for very minor sources. Prepared plain language interpretation letters for CAAA requirements on a one-on-one basis.</p> <p>Regulatory Flexibility Act: Support state efforts for self-audit/self-certification. Support efforts involving alternative compliance requests for regulatory issues. Support for amnesty programs for voluntary disclosure. Work closely with enforcement bureaus to ensure reasonability in enforcement actions.</p> <p>Equal Access to Justice Act: Participated in NEWMOA initiative to minimize impact of auto repair and refinishing operations in low socio-economic areas. (This also was an extension of a NH SBAP initiative to provide compliance assistance manuals to the industry in NH.) Ensure compliance assistance efforts to identify and address concerns for minimization of transfer of impacts to low socio-economic areas.</p>
New Jersey	N/R
New Mexico	<p>Paperwork Reduction Act: NM SBAP tries to comply by printing all interagency and outside correspondence using both sides of the paper. Additionally, all waste paper is used as scratch paper (e.g., emissions calculations, draft memos). All paper is recycled.</p> <p>Regulatory Flexibility Act: Action teams comprised on NMED personnel, NM business people, and environmental groups were developed to take a look at and recommend improvements to the current policies and regulations.</p> <p>Equal Access to Justice Act: All state regulations are available on our web site and bulletin board.</p>
New York	<p>Through input of the SBTCP during the regulatory process, streamlined permitting procedures for small businesses have been incorporated into NY's operating permit program. This will significantly reduce the costs associated with permitting minor sources and the paperwork required to be submitted to the state regulatory agency.</p> <p>SBTCP also has developed industry-specific guidebooks and brochures that summarize regulatory requirements in simple terms, thus reducing the amount of copying and reproduction of extensive regulations.</p>
North Carolina	<p>1) Work in state regulatory arena to increase number of exemptions from permitting of insignificant activities. Eliminates the need for unnecessary permits. 2) Helped develop cutoffs for different types of operations included in an exclusionary rule that defines potential emissions as actual. Allows small facilities to use more realistic emission calculations to meet requirements and minimizes the recordkeeping and reporting requirements. 3) Initiated and helped develop a simplified permit application for non-Title V facilities. This has reduced paperwork required for an air permit application by 50%. 4) Continued work on general permits to ease application process and reduce cost of permit. Work continues on general permits for asphalt plants and aggregates/non-metallic mines. 5) NC is involved in a permit reform effort with the goal to reduce paperwork and improve regulatory flexibility.</p>

TABLE E-15
(Continued)

Program	Comment Received
North Dakota	CAP reviewed documents pertaining to dry cleaner facility pollution prevention and new rules. CAP discussed issues regarding the impact of new rules and policies of the various media programs that are pertinent to small businesses.
Ohio	No progress. However, the seventh CAP appointee is an attorney, which should influence the work the CAP does in 1997 on this subject.
Oklahoma	SBAP has been actively involved in a major regulatory revision within the Agency. Recently, our Director developed a new permitting approach/philosophy requiring a more common sense approach to environmental regulations. This includes air quality rules, most specifically those that affect small businesses. As a result, SBAP has been and continues to be actively involved in the process representing the needs of small businesses and developing strategies that are mutually beneficial to the environment and the small business community.
Oregon	<p>Paperwork Reduction Act: OR's SBAP and CAP did not impose additional reporting or recordkeeping beyond that required by federal law. Non-major PTE Title V (50% rule) permits were deferred until July 1998. Permitting of area NESHAP sources also have been deferred in accordance with EPA published policies. Permanent exemptions have been given to decorative chromium electroplating and anodizing businesses using fume suppressants. SBAP also is considering various regulatory options for small air emission sources, which will alleviate overly burdensome paperwork and reporting requirements. Options under consideration include prohibitory rules, permit by rule, and general permits.</p> <p>Regulatory Flexibility Act: OR continues to explore ways to attain full compliance with state and federal regulations without placing undue burdens on small businesses. Small businesses with actual air emissions less than 50% of major source threshold need not apply for Title V permit until July 1998. It is estimated that this action will reduce the regulatory burden for at least 1,000 smaller businesses. OR also has elected to defer permitting of non-major dry cleaning, chrome plating, ethylene oxide sterilizing, and users of regulated halogenated solvents for 5 years in accordance with the 1990 CAA.</p> <p>Equal Access to Justice Act: OR SBAP and CAP are unaware of any provisions in state statute, Title V regulations, or the Small Business State Implementation Plan that violates or contravenes any requirement set forth in this Act. Minority business owners serve on the CAP.</p>
Pennsylvania	N/R
Puerto Rico	None.
Rhode Island	SBTCP program coordinator hired in November 1996. Formal program currently is being developed. The intent of these provisions will be incorporated, as appropriate, into the Rhode Island program.
South Carolina	Receiving/providing information electronically. General permits for certain types of industries. Review/comment on new air regulations to evaluate impacts. Routine review of SBTCP documents for compliance.

TABLE E-15
(Continued)

Program	Comment Received
South Dakota	The department's goal always has been to have simple, easy to understand forms. The forms have not been updated since the CAP has been appointed. Therefore, the CAP has not had to review any forms yet.
Tennessee	CAP not appointed.
Texas	<p>Paperwork Reduction Act: All materials are reviewed by a statewide plain language committee to ensure materials are brief and easy to read.</p> <p>Regulatory Flexibility Act: Developed a wood products amnesty program to identify problems and inconsistencies with air regulations. SBAP is working on revisions to the standard exemption that applies to wood products manufacturers to reduce reporting and simplify compliance. Developed the foundry initiative, which will identify problems and inconsistencies with environmental regulations. Recruited small businesses to serve on statewide rule review committee to review and comment on environmental rules that affect small businesses.</p> <p>Equal Access to Justice Act: Recruited legal volunteers through the EnviroMentor Program to provide legal expertise to businesses that cannot afford it.</p>
Utah	<p>Paperwork Reduction Act: Committee is providing ongoing input on outreach materials, which includes brochures, surveys, newsletter, mass mailings, etc. for readability in accordance with this Act.</p> <p>Regulatory Flexibility Act: SBAP/SBO and Air Quality have provided presentations and training to the Committee on technical materials and regulatory changes to encourage input and discussion on various changes in state and federal standards and requirements.</p> <p>Equal Access to Justice Act: SBO provided regulatory statutes to all CAP members and SBAP staff. SBO conducted national research on this Act as well as local research with a Utah-based national expert, Dr. Susan Olsen, University of Utah professor and nationally published authority on this Act. This information was relayed to CAP and SBAP.</p>
Vermont	No actions in this area have yet been taken.

TABLE E-15
(Continued)

Program	Comment Received
Virginia	<p>Paperwork Reduction Act: SBAP is making every effort to communicate and provide assistance electronically with all constituents. EPA Leadership Grant is providing an excellent platform for this electronic development. The program also is actively involved in development of permit application forms and permit boilerplates to facilitate the ease of understanding and the reduction of paper in the regulatory process. SBAP was the chair of an internal committee to develop a general permit exclusionary rule to limit the number of sources impacted by regulations. Additionally, the DEQ is highly active in paper recycling.</p> <p>Regulatory Flexibility Act: SBAP participated in joint development of Title V application boilerplate for Title V and the Wood Furniture Manufacturing MACT to ensure all applicable standards and requirements are covered and are in a format to enhance understanding. SBAP director participates on behalf of the ombudsman in regulatory development activities. This year, we participated in the development of a minor NSR permit regulation revision, state operating permit regulation revision, and a general permit potential-to-emit exclusionary rule. SBAP maintains active dialogue with the Agency enforcement activity so that small business policies and protocols are kept visible. Enforcement relief is provided through the utilization of the 507 Enforcement Policy.</p> <p>Equal Access to Justice Act: SBAP developed and maintains a service-specific listing of contractors willing to work with small businesses as well as large businesses. Regulation development activities encompass the goals of this Act by reducing, where possible, the regulatory burden of the small businesses. DEQ has been involved in a regulatory reform initiative for the last several years, reviewing all of its regulations for applicability, understanding, and possible improvement.</p>
Virgin Islands	N/A
Washington	CAP has given SBAP full support in participation in Air Quality Program's rulemaking activities to assure compliance with the Paperwork Reduction Act.
West Virginia	<p>SBAP developed alternate reporting forms for specific industries that consolidate information required for meeting some state and federal rules (e.g., dry cleaners, chrome electroplaters). SBAP and SBO are working with the permitting/enforcement group and trade organizations to develop general permits for specific industries. Two individuals have now been assigned the specific task of developing a coal handling/preparation general permit. SBO intercedes on behalf of small businesses at their request during enforcement actions. This follows the intent of the Regulatory Flexibility Act and the Equal Access to Justice Act. SBTCP has an ongoing effort to coordinate and develop agency policies that consider the limited resources of small businesses and ensure consistent and equitable treatment. SBAP developed less intimidating forms for minor violations that may be used by enforcement staff. CAP solicited input from industry on current regulations for use in developing future legislation that may resolve some small business issues. The panel also is supporting the development of an environmental loan program to help those with inadequate resources to implement pollution prevention measures or install control equipment.</p>

TABLE E-15
(Continued)

Program	Comment Received
Wisconsin	<p>Wisconsin SBTCP/CAP initiated several actions in order to comply with the general principals of the Paperwork Reduction Act including: 1) Using written materials developed by other state SBAPs. 2) Producing rule regulation summaries that are more concise and easier to read than state and federal statutes. 3) Having CAP review outreach programs/materials to ensure they are concise, effective, and understandable. 4) Working cooperatively with University of Wisconsin Extension and Wisconsin DNR on an ongoing basis to prevent duplication of effort. 5) Working to develop a customer friendly version of permit database.</p> <p>Wisconsin SBTCP/CAP has been complying with the general principals of the Regulatory Flexibility Act by: 1) Bringing proposed environmental legislation to CAP for review and comment. 2) Ensuring comments made by the CAP are presented to the state legislature and/or key leaders in state agencies. 3) Acknowledging the problems small businesses have in dealing with environmental regulations and addressing them by providing direct assistance. This assistance includes helping with calculations, clarifying rules and standards, sponsoring industry specific seminars, creating user friendly publications, and providing referrals to other agencies providing assistance. 4) Working closely with trade associations such as the Wisconsin Fabricare Institute, Printing Industry of Wisconsin, Wisconsin Manufacturers and Commerce, and many others in developing outreach materials and obtaining feedback on regulations affecting their industries. 5) Referring businesses to our Small Business Ombudsman, who has statutory reg flex responsibility and convener power as part of her duties. The Small Business Clean Air Ombudsman (H. Rothwell) is separate from the Small Business Ombudsman (C. Gain).</p> <p>Wisconsin SBTCP has not had any business request information on the Equal Access to Justice Act nor has the program received any calls from companies considering legal action against the U.S. or Wisconsin state government. Businesses that call requesting information on bringing action against the U.S. government will be provided a copy of the Equal Access to Justice Act and advised to consult with legal counsel.</p>
Wyoming	<p>During 1996, CAP did not critique SBTCP regarding these provisions, but has received copies of the various SBAP mailings.</p>

N/A Not applicable
N/R No response

**TABLE E-16
SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS
OF THE REGULATORY FLEXIBILITY ACT**

Program	Simplified/ consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions for insignificant activities	General permits for certain types of industries / industrial specific permits	Routine review of SBTCP documents for compliance	Amnesty program	Review/comment on new air regulations to evaluate impacts	Other (See below)
AL	N/R						
AK	X			X			X
AZ							X
AR						X	
CA	N/R						
CO				X			
CT			X			X	X
DE							
DC	N/A						
FL	N/A						
GA						X	
HI	N/A						
ID	N/A						
IL	N/A						
IN		X				X	X
IA	N/A						
KS	N/A						

TABLE E-16
(Continued)

Program	Simplified/ consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions for insignificant activities	General permits for certain types of industries / industrial specific permits	Routine review of SBTCP documents for compliance	Amnesty program	Review/comment on new air regulations to evaluate impacts	Other (See below)
KY						X	
Jeff Cty	See KY						
LA	N/A						
ME				X			
MD	N/A						
MA	X		X				
MI	N/A						
MN						X	
MS				X			
MO	N/A						
MT				X			
NE	N/R						
NV	N/A						
NJ	N/R						
NH					X		X
NM				X			
NY	X			X		X	

TABLE E-16
(Continued)

Program	Simplified/ consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions for insignificant activities	General permits for certain types of industries / industrial specific permits	Routine review of SBTCP documents for compliance	Amnesty program	Review/comment on new air regulations to evaluate impacts	Other (See below)
NC	X	X	X			X	
ND				X		X	
OH	N/A						
OK						X	
OR		X					X
PA	N/R						
PR	N/A						
RI	N/A						
SC			X	X		X	
SD	X						
TN	N/A						
TX	X	X	X	X	X	X	
UT						X	
VT	N/A						
VA	X		X			X	X
VI	N/A						
WA							

**TABLE E-16
(Continued)**

Program	Simplified/ consolidated permits and/or forms	Eliminating unnecessary permits by increasing exemptions for insignificant activities	General permits for certain types of industries / industrial specific permits	Routine review of SBTCP documents for compliance	Amnesty program	Review/comment on new air regulations to evaluate impacts	Other (See below)
WV						X	X
WI				X		X	X
WY	N/A						
TOTAL	7/13%	4/8%	6/11%	11/21%	2/4%	16/30%	9/17%

Other Actions:

- AK** Evaluating opportunities for regulatory flexibility and developing incentives for compliance to promote environmental excellence.
- AZ** SBAP continues to work within the agency to provide regulatory flexibility for businesses that have a proven history of environmental compliance. SBAP applied for a grant from EPA Office of Water to set up pilot projects to investigate regulatory flexibility for businesses implementing an environmental management system.
- CT** Small workshops to provide hands-on permitting assistance to small businesses. On site compliance to autobody shops.
- IN** Allowing companies in violation of environmental rules to participate in supplemental environmental projects, thereby allowing companies to make environmental improvements while reducing their penalties.
- NH** Support efforts for self-audit, self-certification. Support efforts involving alternative compliance requests for regulatory issues. Work with enforcement bureaus to ensure reasonable enforcement actions.
- OK** Developed new permitting approach/philosophy requiring a more common sense approach to environmental regulation.
- OR** Non-major PTE Title V permits deferred to July 1998 and 5 year deferment granted to non-major dry cleaning, chrome plating, ethylene oxide sterilizing, and users of regulated halogenated solvents (as per CAA).
- VA** Enforcement relief provided through 507 Enforcement Policy.
- WV** SBO intercedes on behalf of small businesses at their request during enforcement actions.
- WI** Providing technical/regulatory assistance to small businesses. Developing outreach materials with and obtaining feedback from trade associations as to their membership needs. Referring small businesses to SBO, who has statutory regulatory flexibility responsibility and convener power.

TABLE E-17
SBTCP ACTIONS TO FOLLOW THE INTENT OF THE PROVISIONS
OF THE EQUAL ACCESS TO JUSTICE ACT

Program	Routine review of SBTCP documents for compliance	Pro bono legal services	Funding/technical assistance for groups aggrieved by regulatory agency actions	Other (See below)
AL	N/R			
AK	X			
AZ			X	
AR	N/R			
CA				X
CO	X			
CT				X
DE	N/R			
DC	N/A			
FL	N/A			
GA	N/A			
HI	N/A			
ID	N/A			
IL	N/A			
IN	N/A			
IA	N/A			
KS	N/A			
KY				X

TABLE E-17
(Continued)

Program	Routine review of SBTCP documents for compliance	Pro bono legal services	Funding/technical assistance for groups aggrieved by regulatory agency actions	Other (See below)
Jeff Cty	See KY			
LA	N/A			
ME	X			
MD	N/A			
MA	N/A			
MI	N/A			
MN	N/R			
MS	X			
MO				X
MT	X			
NE	N/R			
NV	N/A			
NJ	N/R			
NH				X
NM				X
NY	N/R			
NC	N/R			
ND	X			
OH	N/A			

TABLE E-17
(Continued)

Program	Routine review of SBTCP documents for compliance	Pro bono legal services	Funding/technical assistance for groups aggrieved by regulatory agency actions	Other (See below)
OK	N/R			
OR	N/A			
PA	N/R			
PR	N/A			
RI	N/A			
SC	X			
SD	N/R			
TN	N/A			
TX	X	X		
UT				X
VT	N/A			
VA	X			X
VI	N/A			
WA	N/R			
WV				X
WI	N/A			
WY	N/A			
TOTAL	9/17%	1/2%	1/2%	9/17%

**TABLE E-17
(Continued)**

Other Actions:

CA	ARB provides in its administrative proceedings a full and fair opportunity for parties to present their claims. An example is our heavy-duty vehicle inspection program hearings.
CT	SBO serves on Air Bureau's CAA Advisory Committee, which provides updates on new regulatory requirements and technical assistance. CAP has several subcommittees dedicated to specific small business sectors. Stakeholder involvement initiated as part of the regulatory development process.
KY	SBO talked to Agency minority recruitment person on methods of increasing outreach.
MO	Targeting small businesses that may not have the capital or human resources to allow them to comply with CAA requirements.
NH	Participated in NEWMOA initiative to minimize impact of auto repair and refinishing operations in low socio-economic areas. Ensure compliance assistance to minimize transfer of impacts to low socio-economic areas.
NM	All state regulations available on web site and bulletin board.
UT	SBO conducted national and local research on this Act, which was relayed to SBAP and CAP.
VA	SBAP maintains list of service-specific contractors willing to work with small and large businesses.
WV	SBO intercedes on behalf of small businesses at their request during enforcement actions.

APPENDIX F

PROGRAM EFFECTIVENESS

TABLE F-1
COMMENTS RECEIVED BY THE SBO OR THE CAP ON THE SBTCP
(Comments edited for space)

PROGRAM	COMMENT RECEIVED
Alabama	We get very favorable feedback on our efforts to assist businesses with environmental compliance issues. Anything to help navigate the maze of regulations is warmly received.
Alaska	Positive comments: Very professional staff. Very knowledgeable staff. Information received useful in reducing pollution. Quick response time. Negative comments: Do not trust anyone in the Department (ADEC).
Arizona	Due to the nature of our program, our customers have responded 100% that our services have been excellent and they are appreciative of our efforts. I personally feel that although we help people understand the current regulations and their complexity, we need to focus on making those rules more understandable for small businesses. We need to make upper level management, community members, and environmental groups aware that we can still protect and preserve the environment with much more understandable rules!
Maricopa Cty	N/R
Pima Cty	"This is the first time in 24 years of business that I found someone courteous and really concerned with my problems. John Bernardo was all of that and more. He listened and actually helped me with the problems." "I have been told by other business owners that the business assistance program might be eliminated. That would result in less help for businesses, less information being given, which would result in a negative impact for the environment. I would hope that the business assistance program would be expanded with more manpower given to education of business owners and operators." "Many companies believe that they shouldn't invite anyone from a regulatory agency to their site. People told us that we were taking a big chance or inviting trouble. I believe that our visits from the Business Assistance Program improved our company tremendously. This past year, much attention has been given to environmental and safety concerns. We are more environmentally conscious now than we have ever been."
Arkansas	"Glad to have help from a regulatory agency." "Was reluctant to ask for assistance, but was relieved afterwards." "Wanted to do the right thing, but wasn't sure how to go about it." "Welcome any help they (company) can get."
California	"Extremely helpful. Very knowledgeable and expeditious regarding my concern and how to address solving my problem." "Very responsive to our request for help - even though it didn't directly involve this agency." "Your web page/e-mail is great - a model for all agencies."
SCAQMD	Businesses like the improvements in service. Multilingual staff is a great asset. Economic development efforts have been appreciated. Our efforts to coordinate P2 solutions with water agencies have been appreciated.

**TABLE F-1
(Continued)**

PROGRAM	COMMENT RECEIVED
Colorado	No complaints have been received by the SBO or CAP.
Connecticut	<p>CT SBAP has been recognized by EPA as a national model for innovative approaches to compliance. The Financial Assistance for Vapor Recovery Systems (FAVRS Loan Program) was cited as a model program by Carol Browner in materials presented at the White House Conference on Small Business this past year. The program continues to serve as a model for other programs within DEP and with other State agencies. The program has been cited as a model by EPA Region I as part of a federal review of the air enforcement program. EPA commented on the positive impact the SBAP has had in promoting compliance.</p> <p>Businesses comment regularly that the services provided through the program are extremely helpful. Numerous comments have been received on the quality of the staff presenting at workshops and training sessions as well as responding to phone calls and providing on-site technical assistance. Numerous comments have been received on the clarity of materials provided, particularly the FAST Vs training manual, which provides step by step instruction on calculating emissions to determine Title V applicability. Several comments have been received that training sessions have been extremely valuable and should be repeated.</p>
Delaware	<p>"Very helpful in completing a permit application." "Glad to have someone representing interest of small business."</p> <p>"Nice to know who to call with a question about compliance."</p>
District of Columbia	None.
Florida	N/A
Georgia	<p>"The SBAP's patience and understanding when clarifying in laymen's terms really pleased us." "The prompt response of the SBAP really pleased me. Thanks for your assistance." "I was explained clearly about the guidelines and my company's status and options. This was very important to us." "When you explain the rules (wood furniture), it is so simple. Thank you so much."</p>
Hawaii	N/A
Idaho	None.
Illinois	<p>Most all comments received either by mail, in person, or by phone have been very complimentary since we have stressed the usage of our "Illinois EPA's Quick Answer Director." The comments received by the SBO now are answered quickly and intelligently. The clients' requests are being directed to the right technical person or persons.</p>

**TABLE F-1
(Continued)**

PROGRAM	COMMENT RECEIVED
Indiana	<p>Verbal comments made to or regarding CTAP: At the Governor's Conference on the Environment, two dry cleaners talked at length about CTAP's work with the trade association and how the new cooperation is what small business owners want from a regulatory agency. Comments received from auto body shops were mostly positive, along the line of, "Best thing IDEM has ever done." At a recent workshop, a participant told the group he would prefer to address questions to IDEM's CTAP group than to consultants, because he trusted our knowledge and insight more than a consultant's.</p> <p>Comments from Title V workshop evaluations: "After going to 2 other seminars (consultant-run), this is the best one I've been to. Very helpful." "I really liked the applicability worksheets. First time I've seen such a straight forward approach to this issue." "All was good." "Good workshop!"</p> <p>Comments regarding FaxBack and other tools to obtain information from IDEM: "Where was FaxBack and Custom Connect 20 years ago?" "Making the Locator List available to external customers is the best thing IDEM has ever done!" "These services (FaxBack, Custom Connect, and the Locator List) are making Indiana a leader in providing needed information."</p>
Iowa	<p>Small businesses who have used the services of the IAEAP have been very pleased with their expertise, professionalism, and dedication. This observation is based on verbal accounts relayed to the SBO at public meetings and in phone conversations. IAEAP continues to be nationally recognized for their innovative programs and publications.</p>
Kansas	<p>The greatest compliments we receive come from "repeat" clients. Many of our callers have asked us for assistance many times and always express their appreciation for our many free services. Several consultants have expressed their appreciation for the many publications we provide. Responses on evaluations of workshops indicate an overwhelming appreciation for services provided, and support and gratitude from trade associations. One of the best (verbal) responses the SBEAP received was the comment that "this is really good use of government funds."</p>

**TABLE F-1
(Continued)**

PROGRAM	COMMENT RECEIVED
Kentucky	<p>(Sample of comments provided.) "Excellent program. Great help for small businesses. When will similar service be offered for water and solid waste?" "Chris Melton was superb!! BEAP saved me not only money - but time, sweat, and tears! Thank you." "One of the best ideas ever!" "KBEAP saved us thousands of dollars; we could not afford an air quality consultant. We manage our wastes generated appropriately, but it would still be beneficial to have a second opinion to see if we could minimize our wastes more. I do want to know more about water wastestreams." Most definitely as a small company, we want to comply with the regulations, but sometimes find it difficult to get accurate information. Good service!" " We would have been hard pressed to comply with the new air quality regulations without this assistance."</p> <p>Economic Development Cabinet raised questions about clarity of SBAP printed information on confidentiality. Concern was expressed about amount of publicity on national telecast.</p>
Jefferson Cty	I have not received any comments from the regulated community, positive or negative, on the effectiveness of the SBTCP in Jefferson County.
Louisiana	<p>(Sample of comments provided.) "Leah helped me beyond the call of duty. When I had question, she had the answers. I could not have asked for a better assistant. Leah did an excellent job." "Leah Rogers provided all the technical assistance and forms needed. She also did all the necessary calculations and provided assistance over the phone. She was very professional and efficient." "Anything the SBAP can do for the independents is greatly appreciated. This is the first time, that I am aware of, that the GOVERNMENT does anything to help. This is quite a bit different from the way the NORM permits were handled -- it is definitely not threatening and my company really appreciates the service you have just provided. THANK YOU." "There should be more publicity about the assistance." "Continue to employ people with the character, concern, and ability of Mr. Martin."</p>
Maine	Overall initiatives receive positive comments. Typical -- "It's about time." "SBTAP was a great help."
Maryland	N/A
Massachusetts	N/A

**TABLE F-1
(Continued)**

PROGRAM	COMMENT RECEIVED
Michigan	<p>SBO: No specific comments, but overall feedback on the services provided by the SBO has been positive.</p> <p>SBAP, Education and Outreach: SBAP held three education and outreach events during the 1995-96 fiscal year: two workshops (one for the Renewable Operating Permit and one for Hard and Decorative Chromium Electroplaters) as well as one teleconference (Wood Furniture Manufacturers). Evaluation forms were completed by participants at each event with most participants rating the event as "Good" or "Excellent."</p> <p>SBAP, On-Site Technical Assistance: SBAP also received three appraisal letters from customers complementing the effort and quality of personalized outreach assistance provided.</p>
Minnesota	<p>1996 SBAP annual customer survey with many comments about program. New ongoing SBCAP customer follow up questionnaire.</p> <p>(Sample of comments received.) "MPCA helped us build a new vapor degreaser, which allowed our company to drastically reduce our emissions and use of solvent. The guidelines were clear and the assistance and plans were detailed - we also appreciated the visit here at our plant." "I am able to conserve better and to prevent any waste. I am more cautious." "The volume of environmental regulations seems ever increasing and increases our cost of doing business. More effort should be devoted toward streamlining regulatory requirements and reporting needs. There is a need to make reporting and license/permit applications more user friendly."</p>
Mississippi	N/R
Missouri	None.
Montana	SBO/SBAP received letters of thanks from two dry cleaners, a hot tub manufacturer, a chromium electroplater, five gasoline distribution centers, a representative from a large coatings manufacturer, a tire shredding operation, and a group of grain elevator operators.
Nebraska	<p>From a bottling company, "The Small Business Assistance Program has been extremely helpful during the process for determining our obligation under the Title V requirements." From a manufacturing facility, "The Nebraska Department of Environmental Quality was very good to work with, especially the Small Business Assistance Program. The efforts of many of the staff at NDEQ have made my job much easier. From the Fabricare Association, "A very sincere thank you to the assistance that was provided to our members through the Small Business Assistance Program of Nebraska."</p>

**TABLE F-1
(Continued)**

PROGRAM	COMMENT RECEIVED
Nevada	SBAP has received oral communications from various particulate generating facilities on the need and benefit of the SBTCP. Both SBAP and SBO receive comments from industry representatives that this program is the "best kept" secret in the state, indicating that more public relations work may be necessary to make industry aware of this program.
New Hampshire	<p>"I was pleasantly surprised to find out a regulatory agency actually provided assistance in meeting rules and regulations." (coating operation)</p> <p>During a state legislative hearing on a bill requiring state agencies to establish assistance programs, the NHDES SBAP was singled out as the type of initiatives the legislation was seeking to have established. All of the business owners and operators that have received assistance from the SBAP/SBO have made very positive comments concerning the program and the agency's attitude for cooperative compliance.</p>
New Jersey	None.
New Mexico	<p>A customer service survey was created by SBAP and positive comments include: "You're doing an excellent job. Please keep up the good work." "Very polite and helpful." "Keep up the good work."</p> <p>The only negative comment that was received was: "Make the dry cleaners self audit checklist easier to read. In particular, question #7 on page 9."</p>
New York	Received many letters of appreciation.
North Carolina	<p>"Departments like yours make small business proud to be in North Carolina." (Owner of a small furniture company)</p> <p>"The purpose of this letter is to send a heartfelt sincere thank you for the assistance received from your office for the air permit application." (Small metal fabricator businessman)</p> <p>"There is no telling how many man hours would have been spent to work out all the calculations necessary to complete the forms without your help." (President of a small business)</p> <p>"Thank you for your presentation and assistance at our meeting last month." (President of an association in NC)</p> <p>"Thanks to all information and materials that you have shared with me during your visit to our company." (Person in company responsible for all environmental requirements)</p> <p>"We greatly appreciated your presentation and your willingness to assist our businesses in complying with these new regulations." (Association president)</p>
North Dakota	None received.

**TABLE F-1
(Continued)**

PROGRAM	COMMENT RECEIVED
Ohio	<p>Ohio businesses that have worked with SBTCP react favorably to its existence. The most frequent reaction is surprise that a program will actually help a business work through the nitty gritty calculations and permit challenges. Many businesses approach the SBO or SBAP with trepidation, based on "stories" they have heard. This approach is frequently the business' first voluntary contact with a state agency. It is clear that the most valuable service provided by the program to date is TRANSLATION: What do the rules mean? How do they apply to me? What do I do with this form?</p> <p>The most intensive work with a single industry has been with small printers. The trade association, Printing Industry of Ohio, forged a leadership position and defined its mission as achieving a "culture change" in how small printers approach environmental compliance. Initial indications are that the ENVIROPRINT OHIO project accomplished this; a more complete evaluative study is currently in the final stages.</p> <p>The negative comments tend to center on the same issues, which frustrate program staff: Why doesn't the program reach more people more quickly? Why hasn't the entire regulatory agency taken this approach?</p> <p>One of the most frequently raised issues is the necessity to have the program be multimedia and not restricted to air issues. Small businesses do not take media based distinctions; in fact, many do not distinguish between different government agencies.</p>
Oklahoma	<p>OK SBAP, as part of the Customer Assistance Program, continues to receive extremely positive feedback from those we have assisted in the past year. While some businesses may not appreciate being regulated, without exception each one has been very grateful for the help they have received from our program. We anticipate involving small business more in the regulatory process as the Panel continues to grow into its mission.</p>
Oregon	<p>No negative comments were received during the 1996 reporting period. SBAP saw an increase in the number of businesses and individuals seeking assistance, which may indicate greater acceptance of the program. A written memo was received from a dry cleaning equipment vendor for sponsoring a workshop. SBAP helped a small rendering business with a tax credit application for expenses incurred to eradicate an odor problem; the company was granted tax credits. A CAP member received positive comments from a dry cleaning business owner who received an on-site compliance evaluation. A private painting contractor who previously received SBAP technical assistance requested an evaluation of his proposed water based painting system. Individuals affiliated with the secondary wood products industry and several wood finishing businesses verbally thanked the SBAP for broadcasting the EPA/University of Tennessee wood furniture manufacturing teleconference. Several dry cleaning businesses verbally expressed unqualified appreciation for services provided.</p>

**TABLE F-1
(Continued)**

PROGRAM	COMMENT RECEIVED
Pennsylvania	SBO position has been vacant since 4/96. This information is unavailable.
Puerto Rico	In the meeting held with the CAP, we gave them a brief insight of the SBAP. They liked the purpose of this program, but it seems that if our office doesn't take the lead, no one will.
Rhode Island	(Selected comments from letters received.) "Just a note to compliment Roger Green[e] of your staff...We appreciate the fact that we have a single contact person to go to 'when things get a little slow.'" "As you probably hear many more complaints than you deserve, I want to take a minute to express my appreciation for all of your efforts to move the process along on the 'Fidelity Permits.' It was an outstanding effort-we thank you and my guess is the Governor thanks you."
South Carolina	Comments have been consistently positive.
South Dakota	Contacts with the Small Business Ombudsman generally have been positive and in the form of requests for information or points of contact within regulatory programs. Often these contacts involve air sources with questions outside the air program. Contacts to the Small Business Ombudsman regarding assistance from the Small Business Assistance Program have been very favorable.
Tennessee	TN Air Pollution Control Board, which has the authority to establish the program's funding level, has been complimentary of program efforts following program update presentations. TN Association of Business complimented activities conducted by the program. Businesses have indicated they are pleased that such a program exists. Consultants have expressed their happiness to see a voluntary compliance program for small businesses implemented.
Texas	"Santos Olivarez assisted us a great deal. I really appreciate all of the help and assistance that he gave us. Your department should be proud to have such a person within your organization." "Educate small manufacturers. Provide NR primer to TMAC field engineers." "Keep us informed on any changes in the news. Thank you all very much for helping us keep in compliance with EPA rules and regulations." "It was about as easy as it could get thanks to Tim Mays and Polly Gustafson. The people in Austin that I dealt with were more than helpful. Never in government have I had this good." "Cut down government involvement in our day to day business lives while making life better for all. I was pleased at the Director's swiftness in response and clarification."

**TABLE F-1
(Continued)**

PROGRAM	COMMENT RECEIVED
Utah	<p>Appreciate opportunity to comment on regulations and to provide feedback. Appreciate technical presentations, however would prefer fewer presentations. Appreciate outreach review and input opportunities, but concerned their voice may not be heard in overall review. Would like more regular and substantive meetings. Comment that '95 Amnesty program was too short for business community; would prefer "Industry Amnesty" windows be provided for specific businesses. Would like longer on-site visits. Concerned that businesses are not receiving needed information, even with extensive outreach efforts. Concerned about confidentiality with enforcement, especially for on-site visits. Concerned about heavy penalties to small businesses that are unaware of requirements. Concerned that permit approval process is too lengthy, thus delaying business operations.</p>
Vermont	<p>No comments.</p>
Virginia	<p>We have received positive comments on the usefulness and the ability of business to access non-regulatory technical assistance that is willing to listen and understand the regulatory difficulties of the sources. "It is refreshing to see the cooperative effort and support provided by and through the VA Small Business Assistance Program." "I would like to take this opportunity to thank you for traveling all the way from Richmond to help with my permitting quandary."</p>
Virgin Islands	<p>CAP - not yet named. No comments from SBO.</p>
Washington	<p>CAP received no specific comments on the SBTCP.</p>
West Virginia	<p>All comments have been positive. "I would like to take this opportunity to express my sincere appreciation for the consideration your employees have given me these past few weeks regarding the 'Air Quality Standards' as it applies to a very small business concern such as ours. These people were very knowledgeable in the field in which they work and they were most helpful to me, a layman. It's great to know that there's still hope for the small business people in this world of giants."</p>
Wisconsin	<p>Comments from businesses served by program staff: "Think your approach is creative and getting better results because companies are more willing to cooperate because they are less afraid of reprisals or fines." (Dave Kitzinger, Kitzinger Cooperage Corporation) "As a distributor of VOC-containing products, we have passed through your information to our customers. They have been successful in reducing emissions." (Knute Jacobsen AIC, Inc.) "All my questions were answered and the reference material I requested was provided quickly and in a comprehensive manner. It's hard to see how you can improve on that." (Jack Bates, Diversified Woodcrafts) "We have been able to make recommendations to our clients using your examples." (Joseph Kramer, Badger Lab & Engineering Company, Inc.)</p> <p>Based on our customer opinion surveys we conduct regularly, 83% of our customers would recommend our program to others.</p>

TABLE F-1
(Continued)

PROGRAM	COMMENT RECEIVED
Wyoming	The National Federation of Independent Small Businesses (NFIB) has stated to the CAP and the SBO that small businesses need to know that they can request SBAP assistance and that the agency will not seek penalties when non-compliance is disclosed. The CAP requested that such a policy be adopted by the department to cover multimedia sources.

N/A Not applicable
N/R No response

TABLE F-2
NATURE OF COMPLAINTS RECEIVED/INITIATED BY THE SBO OR THE CAP
AND INFORMATION OF THEIR RESOLUTION
(Responses edited for space)

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
Alabama	N/R	
Alaska	Small business not being treated fairly, asked to do something Department did not ask of others.	Worked with small businesses to achieve compliance with regulations and demonstrated consistency in programs.
	Corrective action required by Department is financial burden and exceeds environmental benefit.	Worked with program staff to achieve balance between corrective action and financial burden to individual with acceptable level of environmental protection.
	Department actions not consistent between various offices around the state.	Worked with Directors and Commissioner Office to ensure consistency statewide.
Arizona	Permitting staff not responsive or understanding to customers' needs.	Serve as mediatory between the two and work directly with permitting staff to not only complete current application, but be sensitive to small business needs.
	Timelines for permit application approval too long.	Continuing to develop General Permits and currently participating on committee to develop license timeframes for implementation in 1998.
	Inconsistency between inspector and permit engineers in interpreting rules.	Help draw issues to the attention of managers and lead process to develop a consistent approach for handling issues. Develop an open line of communication between the two organizations.
Maricopa Cty	N/R	
Pima Cty	None received or noted.	
Arkansas	Generally complaints directed toward the Agency are routed to our Public Information Section or received by the Director and assigned to a respective division for resolve. Consequently, complaints are not a major assignment of the SBO. Assignment of complaints by the Director are typically long term problems, which have not been resolved by a specific division.	
California	Forms need to be simplified.	Help work through the forms and make connections with appropriate people.
	Not knowing what or how to proceed.	Streamline and speed up the process.

**TABLE F-2
(Continued)**

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
SCAQMD	The agency needs to make information available through general media, especially radio and television news talk programs.	Resolution in progress. Develop and work with media to implement a business services-type PSA for local distribution.
	Small business publication needs to more clearly identify upcoming issues.	Reformat publication.
Colorado	N/R	
Connecticut	Complaints have been received that meeting announcements are sent out late and do not provide enough advance notice.	For monthly meetings of the Clean Air Advisory Committee, an electronic version of the committee mailing list is being developed.
	Seminar and workshop attendees would like us to provide coffee and snacks, particularly for morning-long training sessions.	No decision has been made on how to address this. Minimizing overhead enables workshops and seminars to be provided to small businesses at no charge and eliminates unnecessary administrative duties, which are difficult with a small staff.
	People requesting general assistance would like more staff available to provide technical assistance.	This is difficult to address, since it appears that demand will almost always exceed available resources, particularly during lean fiscal times.
Delaware	State open burning regulations are arbitrary and capricious.	Regulation 13, open burning regs, will be revised in an attempt to make it more straightforward and consistent.
	CAA requirements for small businesses are overly complex and costly.	Every attempt is made to clearly explain what needs to be done in order to comply with the requirements in the CAA. Information on funding sources to finance needed changes is given to requesting small businesses.
	Fear that requesting assistance may result in a monetary penalty or some other action.	Offer confidentiality to persons requesting assistance. Will be implementing a penalty mitigation policy for those businesses that report non-compliance and seek assistance in achieving compliance.
District of Columbia	None.	
Florida	N/A	

**TABLE F-2
(Continued)**

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
Georgia	SBO received a complaint from a chemical manufacturer in Atlanta. This manufacturer received a proposed consent order from Environmental Protection Division/Air Protection Branch citing many violations of state air rules and ordered the company to comply and pay a \$3,000 penalty. The owner retained a law firm to respond to the alleged violations. The attorney contacted the Ombudsman and formally requested his involvement.	Ombudsman initiated an investigation regarding the alleged violations. Because of the Ombudsman's findings, a new consent order was prepared and presented to the owner for approval. The new consent order removed many of the cited violations and eliminated the penalty. It also included a fugitive emission control plan prepared by the SBAP. The plant owner and his attorney agreed to the terms in the new consent order. The plant is in compliance with the air rules, equipment was purchased to reduce fugitive pollutants, and the plant's work environment improved.
Hawaii	N/A	
Idaho	None.	
Illinois	The nature of the complaints generally were from "phone call inquiries." They were sent to the wrong person, no one answered their call, switched around through the agency, too much down time before they were assisted. We are currently working new ideas to combat this problem. Our personnel is more conscientious of the clients' wants and needs!	

**TABLE F-2
(Continued)**

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
Indiana	There were some complaints about needing to do VOC tracking on auto painting. The auto body shops did not know how to do this, nor did they want to spend time on this type of project.	The Office of Air Management, together with CTAP, worked to develop a non-rule policy decision to simplify VOC tracking. The policy allows shops to keep records of the coatings used, reflecting how refinishers actually mix and apply coatings.
	There were some complaints regarding the trainers at the Title V workshops. Some trainers are engineers/technical staff who have a very good understanding of Title V, but are not well suited as trainers.	CTAP held a "train the trainer" session to assist technical staff in conducting sessions for Title V training. Replaced trainers who showed no interest in conducting training or no improvement in their training skills.
	At one Title V workshop, we walked attendees through the process of integrating the Title V application (which was in 4 parts due to revisions). Attendees complained about using workshop time for this laborious process.	CTAP responded by developing a document entitled, "Instructions for Revising Title V Application Packet," which allowed participants to go through this process on their own.
	There were questions regarding the guarantee of confidentiality.	CTAP developed a confidentiality policy and published it in the Indiana Register.
	There was some internal conflict regarding the roles of CTAP and the Office of Enforcement.	CTAP and the Office of Enforcement held meeting where CTAP reported on the progress made regarding working through Supplemental Environmental Projects and other programs.
Iowa	Numerous financing questions/concerns.	Provide packet of information regarding available financing alternatives and tax incentives.
	Complaint regarding complexity and volume of forms.	On-going participation in a construction permit task force. Have revised the forms, received comments from a test group of businesses, and are making final revisions.
	Complaints regarding complexity of regulations and a lack of a "plain English" guide to help determine facility requirements.	Successfully proposed changes to the Small Source Operating Permit rules. Within the Construction Permit Task Force, a sub-committee developed, edited, and published a series of fact sheets. They will be available in the spring on the Department of Economic Development's fax-back system.

**TABLE F-2
(Continued)**

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
Kansas	<p>Most of the complaints/inquiries the SBO receives regard the necessity for permits or if the permit is already in place. SBO has been provided with the ability to view the regulators' permit files in private. Often, this answers the question, "Do I already have an air permit?"</p> <p>One particular complaint occurred because of a change in air emission fees causing the business to pay duplicate fees for one year. Unfortunately, this was not resolved to the business' satisfaction; however, it should not happen in future years.</p> <p>Many inquiries are received by individuals just beginning a business and want to know what they need to do to comply with environmental regulations. We have developed the Roadmap to Environmental Permits and a Service Guide. Also, we have established a positive relationship with other state/federal agencies that deal with new, expanding, or existing businesses, such as the Kansas Department of Commerce and Housing, Small Business Development Centers, Small Business Administration, etc. Many state/federal agencies are represented at our quarterly Business Assistance Group meetings, which facilitate referrals and help foster a spirit of cooperation among those of us who assist businesses with a variety of issues.</p>	
Kentucky	Economic Development Cabinet.	Several meetings have been held to develop solutions to concerns. Revisions to documents are pending.
	National telecast publicity.	SBAP met with SBO and DAQ to discuss different approaches to publicity.
Jefferson Cty	I have initiated a complaint that the SBTCP was not keeping adequate paperwork on their services, making data difficult and time-consuming to retrieve.	A more effective process for keeping statistics will be implemented for this calendar year.
	I have initiated the complaint that the SBTCP was not properly represented to the CAP.	A representative will be assigned to interface with the CAP.
Louisiana	No complaints have been received.	
Maine	None	All questions are handled in a problem solving mode. No major issues brought to CAP.
Maryland	None	
Massachusetts	N/A	
Missouri	None	

**TABLE F-2
(Continued)**

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
Michigan	Enforcement intercession.	Mediate between businesses and agency.
	Permit status inquiries.	Ask regulatory department staff.
	Permit application assistance.	Work with businesses and the state permit-issuing department staff.
	Brownfield redevelopment inquiries.	Provide state department contacts; follow up on department commitments.
	Difficulties with local regulatory district offices.	Mediate between regulatory department district staff and businesses.
Minnesota	Air Quality Permitting Requirements for Soil Roaster - Complaint included unresponsiveness of AQD staff, lack of flexibility, and level playing field issues.	Responsiveness issues resolved by making a change in permitting engineer. Flexibility issues still being determined, but probably through an amendment process. Level playing field issues with associated industries (land farming, landfill cover, etc.) will be proposed for multimedia look at the industry through multimedia rule or new permit.
	Many new start up companies have difficulty in getting all the environmental information they need. They want to do the right thing and it is difficult for the SBO to gather everything and feed confident that nothing has been missed.	Working to make start up business assistance a priority for SBO during next year. Working with multimedia/agency workgroup to develop plan for comprehensive assistance. Same workgroup developed general environmental assistance guide.
	Small business extremely angry that they received huge fine for SARA Title 313 violation. SBAP had helped them with AQ permit, site visit, etc., but did not mention 313 requirements.	Shows once again a need for some level of multimedia efforts and basic knowledge of other programs that small business may be subject to. Encouraged business to cooperate with EPA and demonstrate all of their good faith efforts. In future, like the wood finishing workshops, will include a "heads up" brief overview of SARA and ERC requirements. This small piece of information possibly could have prevented this violation from occurring.
Mississippi	Auto body shop owners expressed their desire to comply with environmental regulations and institute P2 practices.	Four workshops were organized by SBO and SBAP to address these concerns. Workshops were presented in Jackson, Grenada, and Biloxi.

**TABLE F-2
(Continued)**

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
Montana	No complaints received.	
Nebraska	N/R	
Nevada	Permitting concerns.	Explained the regulations and showed how federal law did not allow for much flexibility.
	Compliance concerns.	Provided forum for regulators and industry representatives to resolve compliance issues.
Washoe Cty AQMD	For the past 2 years, over ½ of the complaints have been in regard to nuisances involving construction activities such as tracking of mud on city streets, dust complaints, and the lack of water trucks to control dust.	AQMD tightened requirements on dust control plans that construction projects are required to obtain and abide by. The AQMD attempts to resolve all complaints with the least possible inconvenience to all parties. In the vast majority of cases, simply letting the violator know that there is a problem results in sufficient corrective action. In 1996, AQMD received 573 complaints of which 77 resulted in a formal warning and only 36 in the issuance of a citation.
Clark Cty		All facilities regulated by the Health District are eligible for assistance. They have permitted about 3,000 facilities including some 1,500 construction activity sites, 600 gas stations, 150 dry cleaners, 150 paint booths, minor stationary sources and major stationary sources. They provide information and answer questions, but do not actually prepare permit applications on behalf of the permittees. They do assist them in answering questions about completing such applications.
NV BAQ	The biggest complaint facing BAQ is in regard to permits and time frames for issuance. Because of the requirements under CAAA of 1990, there are a number of facilities that need to be repermited with Title V permits, while others were repermited to keep them out of the Title V program. The repermitting process has caused delays in permit issuances and backlogs of several months.	
NV BEP	No complaints, only requests for air quality assistance.	

**TABLE F-2
(Continued)**

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
New Hampshire	Inability to interpret regulatory applicability.	Provide case by case determinations.
	Too many different regulations to understand.	Work with all media programs to avoid duplication of effort including the development of industry specific compliance manuals.
	Common sense alternative compliance options not allowed.	Work with regulatory development personnel to ensure regulations are performance and not prescriptive based.
New Jersey	None	
New Mexico	N/A	
New York	N/R	
North Carolina	Conflicting information from consultants and regulators.	We briefed the clients on regulatory requirements and met all interested parties to clarify issues.
	Cost of permit, especially with the PE seal requirement.	Developing a Permit Guide Manual.
	Permit requirements too complex/cannot understand the requirements. The cost of complying is too much.	Expanded the exemptions for smaller businesses. Encouraged use of general permits, cutting costs in half or eliminating need for a permit.
North Dakota	No complaints were received.	
Ohio	Relatively few complaints have been received by the SBO. Those tend to center on inability to communicate with a local or regional air regulatory agency and/or inspector.	Preferred response is to connect the complaint with SBAP staff. To date, this has been completely successful. This does not mean the business was happy with the regulatory outcome; it does mean that the complainants felt they received honest and comprehensible answers.
Oklahoma	A two person sawmill that received the "run around" in regard to our Air Quality Division determining their need for a permit.	After representing the needs of the facility, a letter was issued to the owners clarifying the matter. Further this produced a clarification within our own Agency about the issue in question.
Oregon	No complaints were received during the 1996 reporting period.	
Pennsylvania	N/R	

**TABLE F-2
(Continued)**

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
Puerto Rico	None.	
Rhode Island	N/R	
South Carolina	Cost of PE seal requirement.	BAQ developed general permits for some industry sectors, which preclude need for PE.
South Dakota	Contacts are seldom in the form of complaints, therefore, a better description of this table would be "Contacts" and "Resolution of Contacts."	Direct party to the appropriate DENR staff person, usually in the Small Business Assistance Program.
	Who should I talk to about this issue or concern?	
	Do you have some information on this subject?	Provide information to party and direct party to SBAP staff or other DENR staff for additional information.
	What permits do I need for my business?	Provide party with DENR permitting guide and direct them to appropriate DENR staff.
Tennessee	None.	
Texas	A family-owned business that produces brass and aluminum parts had been spreading excess shavings on their property. An EPA investigation declared the property an illegal hazardous waste landfill. EPA ordered the business to pay a penalty of \$817,000 and to clean up the site immediately. The business did not have the resources to do so.	SBAP talked with the business and EPA to come up with a solution. EPA agreed to waive the administrative penalty, the business agreed to cover and fence the contaminated site and install monitoring wells to ensure contamination does not spread, and the business agreed to clean up the site entirely within five years.
	A dry cleaner was investigated by TNRCC and found to be out of compliance with hazardous waste disposal, storage, and handling rules.	SBAP spoke to the dry cleaner and developed a compliance plan. The dry cleaner came into compliance. The owner reports increased sales and says the entire operation is improved. The cleaner won an award from a local business council for their efforts.
	A water supplier for a small Texas community sent a letter to the Governor's office complaining about the number, frequency, and cost of tests they were required to perform on their water system.	SBAP worked with the Water Utilities Section of the TNRCC to secure a waiver for the water company. The waiver allows the company to forego certain tests and perform others less frequently, which results in savings of time and money.

**TABLE F-2
(Continued)**

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
	A small city's Publicly Owned Treatment Works (POTW) contracts with a private lab to do its testing. The lab gives the POTW results of its tests. The POTW was told by a TNRCC regional investigator that they did not have sufficient testing documentation on site.	SBAP contacted several regions and found that the amount of documentation required varied from region to region. A policy was developed and distributed that explains what type of information is needed from POTWs.
Utah	One business felt they should have been included in the Amnesty program.	Complaint was reviewed, but business did not meet qualifications for number of employees.
	Competitor complained that another company was allowed to participate in Amnesty program, but did not qualify.	A previous exemption had been provided by executive order, which the Amnesty Program allowed for through case-by-case review.
	Small business was not properly notified of rejection of hearing request on time.	Company was ushered through the process and agreed to settlement opportunity. Also, hearing request notification concern was reported to Air Quality attorney for follow up to prevent future problem.
	Several concerns expressed regarding general confidentiality issues. It was also reported that an outside program that was advertising confidentiality was not considered to be confidential.	After legislative review by Utah's Attorney General's Office, it was determined that although a self-audit bill exists, it did not cover on-site visits. Further, federal and state government records are, in many cases, open and available for public review.
Vermont	N/A	
Virginia	Do not understand the regulations.	Assist with understanding of the regulations and permitting.
	How can small businesses participate or be represented in regulation development?	Provide representation and notice of upcoming regulatory activity.
	How can small businesses pay for regulatory emissions controls?	Helped to foster the creation of a revolving loan fund for CAA compliance.
Virgin Islands	N/A	
Washington	N/R	

**TABLE F-2
(Continued)**

PROGRAM	COMPLAINT/COMMENT	RESOLUTION
West Virginia	SBO received complaints from several small businesses on "heavy handed enforcement" involving excessive fines and unfair and excessive inspections and inspectors. Also, complaints have been received concerning unreasonable rules and regulations; excessive environmental clean up and equipment costs; the relative high cost of permit applications; and delays in permit processing. In addition, small businesses have also identified a problem concerning air permit requirements for the relocation of small mobile sources that they consider unreasonable and not commensurate with the potential environmental improvements.	<p>When small companies complain about excessive fines, the SBO ensures that the ability to pay is considered and the need to be sensitive to the financial position of small businesses is discussed with enforcement personnel. Also, the onerous practice of enforcement starting with unreasonable fines to obtain a final negotiated fine that is still excessive for the small business was brought to enforcement's attention. This highhanded penalty practice has generally been discontinued except egregious cases. Also, the principles of the "Small Business Regulatory Enforcement Fairness Act of 1996" are now generally being followed.</p> <p>The permit section has expanded a "permit determination procedure," which has decreased the need for "up front" permit application fees and reduced administrative costs for small businesses to some extent. The real permit processing benefits for small businesses will come with the use of "general permits" for both small stationary sources and mobile sources. The SBO solicited 19 states for general permit examples, and the SBAP is working with the permit section and has dedicated two engineers to the general permit development project.</p> <p>SBO alerted the Director of DEP to the small business disruption problems that result from having inspectors from several WVDEP offices conduct multiple, separate inspections for their specific concerns rather than having one multimedia inspection. The DEP Director has given the Assistant Chief the project of bringing the responsible parties together to solve the problem.</p>
Wisconsin	"We wish the government would leave us alone."	Attempted to remove from mailing list. The person filing the complaint did not give their name, address, or telephone number.
Wyoming	No complaints received by SBO.	

N/A Not applicable
N/R No response

**TABLE F-3
SIGNIFICANT PROGRAM ACCOMPLISHMENTS, AWARDS, AND RECOGNITIONS**

PROGRAM	ACCOMPLISHMENTS
Alabama	N/R
Alaska	N/R
Arizona	N/R
Maricopa County	<p>SBEAP and Salt River Project have co-sponsored 3 industry specific workshops for metal finishing/electronics, automotive, and printing. Partnerships like this are the way we leverage our marketing. Since 1/96, SBEAP has helped 56 small businesses obtain their air quality permit. Started a new environmental intern program with Paradise Valley Community College. A complementary article in the Business Journal (4/96) discussed our program and companies we've helped. Several companies provided testimonials. Home page selected as one of the top 10 web sites for small business. SBEAP was a recipient of the National Association of Counties Award (6/96). This award recognized model programs that are innovative in improving and promoting county government in the US. SBEAP, in conjunction with the AZ Department of Environmental Quality (ADEQ) hosted the 2nd Annual Small Business Environmental Awareness Conference, a one-day conference in Scottsdale. The agenda topics included air, hazardous and solid waste, wastewater, Internet, legal issues, and OSHA. 30 sites have been assisted in completing their emissions inventory paperwork since 1/96. We feel the program has been successful because of the items listed above; also the number of sites we've helped has doubled since 1996, with very positive evaluations.</p>
Pima County	Positive newspaper article about program.
Arkansas	Recipient of the 1996 Distinguished Service Award from the Arkansas Environmental Federation.
California	<p>Ten stakeholder forums (8 initial and 2 follow up) were held throughout CA in 1996 to identify how the State's air quality management system can best prepare for the challenges that will be faced in the future. Goals included: identification of program strengths and weaknesses, how current programs can be improved, and identification of what stakeholders see as major areas of concern for the future. Stakeholders from across the state including industry, trade organizations, and environmental and public health advocacy groups attended to help constructively answer these questions via facilitated input, discussion, and debate. Key themes were compiled from the first 8 forums and the ARB and local air districts reviewed these prominent issues and briefed stakeholders on what is already in progress or being planned in response to their concerns.</p> <p>The key concerns identified included: carry forward a clear and strong science-based air program, reduce regulatory complexity and cost, strengthen air quality public information/awareness programs, continue involvement of stakeholders in air programs, and pursue proportionate emission reductions. Stakeholder and agency representatives are planning to come together to form "Tiger Teams" (focus groups) to work on follow up addressing these key concerns during 1997.</p> <p>We have formed a small business meeting group with local Air Districts and business representatives.</p>
SCAQMD	N/R

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Colorado	SBO continues to receive positive comments from the small business community about the Small Business Environmental Fax Network fax alerts. SBO/SBTAP staff traveled throughout CO to provide compliance assistance to dry cleaners at 9 separate locations in regard to the 9/16/96 MACT standard deadline. In addition, a workshop was held for state inspectors to update them on new requirements. SBO initiated a work group to review current APEN forms and make revisions to simplify them. SBO set up a meeting of various local, state, and federal programs in CO that provide free services to small businesses to create a better awareness of each program and to create networking opportunities. SBAP sent chrome plating information.
Connecticut	N/R
Delaware	N/R
District of Columbia	With our severely limited resources, we reach more people by attending trade associations' annual seminars and making presentations there. SBAP made a presentation at the Korean Drycleaners Association annual seminar where 700 business owners and their employees attended.
Florida	The Program received a \$150,000 Leadership Grant. This funding was used to develop Environmental Facility Survey Guidance manuals for multimedia environmental audits. From these manuals, two training seminars were given to the Florida Small Business Development Center's (SBDC's) energy auditors based at their 21 centers. The Grant funds were also used to purchase printed materials on environmental technical assistance and related matters for the 21 SBDC libraries. Multimedia slide materials were developed for presentations to the printing industry. A fact sheet on "why, what, where, and how government regulations affect dry cleaners" was also developed and distributed to the industry.
Georgia	SBAP performed 25 compliance assistance site visits. SBO resolved a conflict between the Air Protection Branch and a small business owner. The information was presented to Karen Brown's office as a small business success story. SBAP staff prepared 3 articles for inclusion in an environmental journal and two small business newsletters. SBAP/SBO joined with government, industry, and trade organizations to sponsor 20 workshops during 1996. We targeted dry cleaners, wood furniture manufacturers, and printers. SBAP/SBO staff made presentations at more than 30 workshops and seminars during 1996. SBAP's SIP was approved during 1996.
Hawaii	N/A
Idaho	None.

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Illinois	<p>SBAP, being located in the same office of the statewide Small Business Development Center network, allows for clients to get linked to both environmental assistance as well as other business assistance services such as financing, business planning, expansion assistance, procurement opportunities and export assistance. We have formed many partnerships, especially with the Illinois EPA Bureau of Air and the IEPA Office of Small Business. Together, we have made great strides in helping companies get the environmental compliance information they want and need, but did not know where or how to get before.</p> <p>The SBAP and staff are involved in other air related projects such as being a pilot state in the Great Printers Project, the Gold Star Program for dry cleaners, participation in the Governor's Pollution Prevention Advisory Council, the Clean Break Environment Amnesty Project, and Governor's Small Business Environmental Task Force, to name a few. We also partner with the Illinois Waste Management and Research Center of the Solvent Alternatives Project and refer clients to them that need on-site pollution prevention assistance. The SBAP was awarded a certificate of commendation by Director Mary Gade with the IEPA for our help on the Clean Break Project in November 1996. The help and support of the IEPA is both critical and appreciated to ensure the success of the Illinois SBAP.</p> <p>The following are quotes from assisted clients: "I very much appreciate the fact that there are programs like this in Illinois government trying to help small businesses such as ours deal with these extremely difficult and complex environmental issues." "Even though we are trying our best to comply, we are reluctant to work with IEPA directly due to bad experiences with them and other agencies in the past." "That meeting saved our company thousands of dollars and an incalculable amount of time, while at the same time pushing us much closer to full compliance status with the IEPA."</p>

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Indiana	<p>Dry Cleaners: The IN Drycleaning and Laundry Association (IDLA) published a compliance manual after receiving a grant for this project from IDEM. For IDLA's efforts on this project, they were given an award from the Central Indiana Technical and Environmental Societies, Inc. CTAP drafted a second manual for the dry cleaning industry that was more simplified than the IDLA manual, allowing small businesses to easily understand their compliance requirements. The IDLA manual continues to serve as a reference manual for dry cleaners that have detailed questions. CTAP has since revised its manual and has also revised its dry cleaner brochure. CTAP's dry cleaner program continued to receive applications for our 5-Star Environmental Recognition Program and, in some cases, has upgraded the number of stars earned by those who are participating in the program.</p> <p>Mineral Aggregate: An environmental compliance manual for IN's aggregate producers was published in January 1996. The IN Mineral Aggregates Association received two awards: one from the National Stone Association and another from the Central IN Technical and Environmental Societies, Inc. for its efforts in working with CTAP to develop the IN Permitting Compliance Manual for the aggregates industry.</p> <p>Mercury: CTAP began working with the Heating, Ventilating and Air Conditioning (HVAC) industry to encourage the reduction and recycling of mercury thermostats. The industry is interested in participating in a pledge program (pledging to encourage the reduction and recycling of mercury thermostats), and is waiting for the mercury recycling program to begin. The producers of mercury thermostats have joined forces to create the Thermostat Recycling Corporation, allowing them to share the costs associated with this endeavor. This new corporation is scheduled to offer mercury thermostat recycling in early 1997. In the meantime, CTAP created a mercury factsheet for the HVAC industry and is working to finalize the pledge program. CTAP plans to initiate its pledge program as soon as the Thermostat Recycling Corporation is ready to begin offering its services.</p> <p>Vehicle Maintenance: IDEM's Office of Solid and Hazardous Waste Management (OSHWM) visited a number of auto maintenance shops in northern IN. The purpose of these visits was not to "inspect" the shops, but rather to help educate shop owners and managers of the proper management of their wastes (although OSHWM does have regulatory authority, which was used in some instances). CTAP worked with OSHWM and the Automotive Services Association of IN to inform and educate the shops of OSHWM's initiative and purpose. CTAP and OSHWM also are working together to assist the vehicle maintenance industry by initiating a program that includes a compliance manual, brochures, workshops, and a 5-Star recognition program. CTAP currently is working on the compliance manual, which will include compliance requirements as well as pollution prevention and good housekeeping suggestions.</p>

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Iowa	<p>The IAEAP tracks client evaluation with a form. Based on a sample of 131 responses, quality of service is rated as "good" or "excellent" by 98 percent. Of the same respondents, 97% would recommend IAEAP to other clients.</p> <p>SBO response: The Iowa Small Business Ombudsman is unique in that the position functions under the direction of the Iowa Citizens' Aide/Ombudsman office, which is a legislative office that has statutory powers to keep investigative records confidential and issue subpoenas. It is a non-partisan, independent agency where action can be taken to resolve complaints. This provides the SBO with a wealth of support and information, as well as the distinct advantage of independence from any regulatory agency. The following activities have made a significant difference for the businesses in Iowa in 1996. 1) After two years of meetings, a revised, streamlined version of the construction permits should be going to the printer in March 1997. The process was grueling and sometimes controversial, but the product was well worth the struggle. 2) DNR implemented a one year amnesty program for as-built construction permits. They continued to send out Notice of Violation letters however, confusing the businesses who were trying to come into compliance. DNR agreed to change the letters to include thanking the businesses for their efforts to come into compliance, encouraging them to review their existing operations before the amnesty period expired, and a list of sources for permit assistance. 3) Iowa National Federation of Independent Business conducted a joint mailing with the SBO to a select group of members identified by SIC code. The mailing resulted in almost 150 calls in less than two weeks. The majority of the businesses needed a construction permit or an operating permit.</p>

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Kansas	<p>A series of Air Emission Inventory and Class II Permit Application Assistance workshops were completed. The workshops were held in Wichita, Salina, Overland Park, and Chanute to facilitate attendance throughout the state. Some comments from the course evaluations included, "Overall, the workshop in Salina was great!" "Keep up the good work; it is people like you who care and bring the information to us." "Thanks again for a great workshop!" "This workshop was great; the small groups were really helpful." Many participants thanked us for being available to them, for providing easy interpretation of regulations, and for answering specific questions. The small group break-out sessions were especially popular. Follow-up assistance and on-site assessments were provided to several workshop participants. SBEAP worked with a manufacturer of farm equipment on their air emission inventory. As a result of the inventory and the realization that they needed a Class I (Title V) permit, the company started exploring pollution prevention and waste minimization opportunities. They also realized that they needed an air permit in the past, so we worked with them and the agency to get them into compliance without a penalty. They currently are eliminating out-of-date or obsolete materials. They have improved their storage and material tracking and are now reclaiming paint overspray for reuse. The company also began to investigate the advantage of using waterbased paints.</p> <p>A manufacturer of lawn mowers assigned an individual to environmental compliance who had very little knowledge about compliance and was concerned about ensuring the company's ability to comply with environmental regulations. This person was provided with a major amount of assistance with compliance and pollution prevention knowledge, which provided them with the ability to explore new options, including the reduction of their hazardous waste generator status by switching to non-hazardous materials.</p> <p>SBEAP also worked with a company that manufactures Lucite parts. Since EPA has no emission factors on estimating air emissions from this process, we suggested a method using existing employee exposure data and information about air changes in their fabrication room to get a gross estimate of emissions. We worked with KDHE's Bureau of Air and Radiation to get approval for this method. The company found that they are not a major source, and we recommended several pollution prevention measures they could take. In order to reduce evaporative losses of their monomer (methyl methacrylate), we suggested switching from open top glass containers to HDPE squeeze bottles.</p> <p>SBEAP worked with the MidAmerica Manufacturing and Technology Centers (MAMTC) to assist a company considering installation of a phosphate wash line to precede their paint line. This visit proved to be a success due to the coordination of our efforts with engineering process changes suggested by MAMTC. The collaboration allowed us to provide the company with pollution prevention ideas and air emission compliance information. Although they do not need a Title V permit, they were unaware of the thresholds and plan to look into alternative paints lower in HAPs.</p> <p>The Kansas AIRLines, the SBEAP's quarterly newsletter, has a circulation of 7,000 per issue, including over 200 new subscribers in 1996. In addition to the newsletter, three major publications were developed and distributed including one for auto body and one for wood furniture. The fact sheet for rotogravure and wide web flexographic printers was revised and updated. Over 500 requests for SBEAP publications were filled this year.</p> <p>Two national teleconferences were downlinked: P2 for Lithographic Printers was shown at 5 locations with 55 participants statewide;</p>

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Kansas (cont.)	<p>the MACT standard for wood furniture manufacturers was downlinked to 5 sites, and we worked with several state vocational and technical schools to provide environmental compliance information to students about to enter the industry.</p> <p>Two important relationships were developed with trade associations, especially to assist with practical methods for information dissemination. We developed a strong relationship with the Printing Industry Association and the Society of Collision Repair Specialists.</p> <p>Kansas was asked to provide testimony on the small business assistance program for the US House Subcommittee for Small Businesses in Washington, DC. This testimony was given at the request of Representative Meyers of the 1st Kansas Congressional District.</p> <p>Kansas SBEAP world wide web page was activated in September. A database system supports the outreach activities of the SBEAP program. As of January 1, 1997, more than half of the SBEAP publications were available on the web site and can be downloaded by clients. They have been placed on the web site in such a manner as to allow clients to download and print the documents in almost the exact format and style of the original printed documents.</p>
Kentucky	<p>Significant accomplishments for the year include: Recognition of value of SBAP services by clients and Division for Air Quality. Increased involvement of Panel Members in program development. Coordination by SBO of agency project to develop a regulation format that incorporates user friendly features.</p>
Jefferson County	N/R
Louisiana	<p>SBO and SBAP cooperated with LSU Forestry Laboratory and Department of Economic Development to organize a full day wood furniture small business expo with the EPA teleconference as the focal point. The Secretary of the Department of Economic Development spoke at the luncheon and several other speakers presented topics of interest to the attendees.</p> <p>SBAP worked with a multimedia group to develop an amnesty program for the foundries in Louisiana. This was the first time this type of cooperation was utilized to assist the small businessman.</p>
Maine	<p>Expanded Small Business Compliance Incentives policy beyond air issues to a multimedia policy. Our SBCIP has been used as a model for other enforcement relief policies such as CLEAN-P2, Star Track, and a draft audit policy. Under these policies, the Department expects to realize compliance and environmental gains that may not have been achieved through other means.</p>
Maryland	<p>Recognition of appreciation at 1996 Awards Dinner of the Korean Drycleaner Association of Maryland and the Korean Drycleaner Association of Greater Washington. Letter of appreciation from Maryland's largest autobody paint vendor. Letter of appreciation from a Maryland regional Chamber of Commerce.</p>
Massachusetts	<p>MA Printers Partnership has been hailed nationwide as one of the most innovative compliance assistance programs to date. During 1996, we made presentations to several national organizations including the National SBAP Conference and EPA's Common Sense Initiative subcommittee on printing. Several of the program structures have been tentatively adopted by the CSI/Print group for inclusion as the backbone of their Flexible Multimedia Permitting Project.</p>

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Michigan	<p>This past spring, Michigan's SBAP, also known as the CAAP, presented a second round of workshops on the state's Renewable Operating (RO) Permit Program. The workshops were developed and delivered by the staff of the SBAP. The workshops took place at six statewide sites and were directed toward the needs of small and medium-sized businesses. The workshops provided timely information regarding changes to the RO Permit Program and how to fill out the RO permit application. Interest and attendance at each workshop exceeded our expectations with more than 390 attendees. As a complement to a previously held workshop in FY 94-95, Michigan's CAAP presented a second workshop for facilities with Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. Approximately 78 people attended. Finally, the CAAP participated in the EPA-sponsored "Wood Furniture Manufacturers" teleconference in September 1996. Approximately 60 people attended. To provide as much information as possible to workshop or teleconference participants, the CAAP followed-up each event with a "Question and Answer" guidance document that addressed additional questions that arose at the workshops/teleconference.</p> <p>Since its inception, Michigan's CAAP also has developed a number of guidance publications for businesses seeking assistance with air quality-related matters. In particular, with the initiation of the state's RO Permit Program, Michigan's CAAP developed a "Renewable Operating Permit Program: Guidebook for Completing Forms," which guides business and industry through the intricacies of filling out the RO permit application forms and submitting an "administratively" complete application. To assist with MACT compliance, the CAAP also has produced a fact sheet that shows wood furniture manufacturers how to comply with the recently issued Wood Furniture Manufacturers NESHAP. The CAAP continues to address the needs of business and industry with the development of "industry guides" that approach compliance from a multimedia, multi-agency perspective. The object of these guidebooks is to encapsulate all the regulatory requirements for a single industry into one, simple to understand document. Recently, Michigan's CAAP took the lead in the development of a guidebook for the Fabricare Industry and is assisting in the multi-agency effort to develop a similar guide for the Lithographic Printing Industry.</p> <p>Michigan's CAAP is part of a wider multimedia agency called the Environmental Assistance Division (EAD). EAD is dedicated to providing timely and effective information and assistance to Michigan's businesses, public agencies, and the general public in understanding and marketing their environmental protection responsibilities.</p>

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Minnesota	<p>SBO - Seeing real movement in multimedia assistance for small business sectors, but some work needed in coordinating these efforts better.</p> <p>Small Business Environmental Loan Program - All \$250,000 has been lent. Six loans went to dry cleaners to upgrade their equipment (5 dry-to-dry machines, 1 aqueous machine), and 1 wood finisher upgraded spray equipment to accommodate the use of water borne finishes. All payments to date have been made in full and on time. During this legislative session, we have upper management and commissioner support to merge two existing small business loan programs for bigger pot of money and for more broad multimedia/P2 capital improvements.</p> <p>SBAP - Wood Finishing Leadership Grant: Participated in workgroup to develop a compliance guide for the Wood Furniture Manufacturing NESHAP's work practices standard, established an enforcement waiver for the wood finishers, rewrote the hazardous waste and air quality self audit checklists, established and published "The Finish Line" newsletter, developed 1/2 day multimedia and P2 workshops for the small/medium wood finishers shops.</p>
Mississippi	SBO and SBAP, in conjunction with the Air Toxics Section of the Air Division, are developing simplified versions of Air Permit Applications for perc and petroleum dry cleaners.
Missouri	The Technical Assistance Program has received many "thank you" letters commending the staff for their efforts. More this year than the previous year. The Technical Assistance Program receives over 1,200 calls per month on the toll free telephone line. Staff are asked to give presentations and workshops across the state.
Montana	SBO continues service as Region 8 representative on National SBO/SBAP Steering Committee as member of the MT State University Pollution Prevention Program Advisory Committee and as a member of the Incineration Rules Development Team for the MT Department of Environmental Quality. SBO also was a member of a group assembled by the state Environmental Quality Council to examine environmental self-audit legislation and a separate team that examined used tire disposal issues. CAP member, Joe Topel, owner of Missoula Textile Services (Missoula), won the second annual Small Business Achievement in Environmental Excellence award from the US Small Business Administration, the MT SBAP, and the MSU P2 Program.
Nebraska	N/R
Nevada	SBAP - N/A
Washoe Cty, NV	Washoe County AQMD has undertaken a number of new programs with the goal of maximizing the effectiveness of their personnel. Foremost is the preparation of the Public Information Packets, which answer the vast majority of the public's questions, thus relieving staff from the duties of answering the same questions repeatedly. This also keeps the phone lines clear allowing speedier response to those with specific questions in regard to some of the unique aspects inherent in the diverse industries that AQMD regulates.

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Clark Cty, NV	The Health District's air pollution control program involves regulations for a variety of stationary sources generally regulated by CAA and non-stationary sources, particularly construction activity. Construction activity is the largest component in the emissions inventory for inhalable particulate matter for which the Valley is one of the six areas designated "serious" in the US. The compliance assistance basically involves answering routine questions from permittees and assisting them with implementation of their operating permit conditions. Our permit specialists/enforcement officers routinely discuss permit issues with permittees. This outreach program has been occurring for years and is an ongoing procedure.
NV BAQ	None.
NV BEP	<p>The air quality compliance outreach program for BEP consists of 6 primary components as defined under contract with SBAP at NDEP. The program began operation in August 1996. The following components were completed by December 1996. 1) Operation of a toll-free information and assistance line. 2) Maintenance of Air Compliance/Pollution Prevention resource center. 3) Development of NDEP Emission Inventory fact sheet and revision of multimedia dry cleaning industry fact sheet, printing P2 fact sheet, and other training materials distributed at the dry cleaning and printing seminars. 4) Delivery of dry cleaning seminar entitled, "Ironing the Wrinkles Out of the Drycleaning Air Regulations" (32 attendees representing 29 businesses). A P2 seminar for printers was provided in 1996 that addressed air P2 and permitting issues (90 attendees). 5) Taped 3 videos of the satellite downlink: Wood Furniture, Chrome Electroplating, and ISO 14000. These tapes have since been loaned to 7 individuals. 6) Seven on-site consultations concerning air quality issues have been conducted.</p> <p>BEP provided outreach through the NV Mining Association Environmental Committee and was publicized in numerous newsletters. The program also is publicized through brochures distributed by state and local environmental agency inspectors and the various development authorities in NV.</p>
New Hampshire	Began an initiative to identify as many small business technical assistance providers as possible. (This is not limited to environmental issues as most small businesses need a broad approach to assistance that will integrate all issues in a financially sound manner.) Initiated the paperwork and funding to establish a NH-based APDLN satellite training site, which is expected to be completed 4/97. Gave presentations to three industry trade associations that previously were very reluctant to allow a "regulatory" speaker to attend their meetings. Presentations were very successful and resulted in a number of requests for on-site assistance. Developed and distributed the "AirGuide" compliance assessment manual for use by businesses, consultants, and regulatory staff in evaluating operations for compliance with CAAA requirements. This manual will be expanded to cover other media in the near future.
New Jersey	<p>Environmental Air Compliance Audit Series - training outside individuals in air auditing; those completing series are places on list of "qualified" auditors that is provided by hard copy and DEP BBS to small businesses. Part of the package includes information on how to select a consultant. Over 100 individuals have completed the training.</p> <p>Small Business Directory of Information - developed and available to small businesses by hard copy or DEP BBS.</p>
New Mexico	N/R

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
New York	<p>On 4/22/96, Conrad Simon, Director, Air & Waste Management Division of US EPA, Region 2, wrote a congratulatory letter that starts: "This letter is being sent to you to express the...(US EPA)...Region II Office's recognition of the tremendous job the Division of Small Business Environmental Ombudsman...Office has done on reaching out to the small business community in New York. In addition, EPA Region II recognized that the Ombudsman's Office has served in a leadership role for all small business assistance programs nationwide and is recognized as a "model program" by many states.</p> <p>SBTCP was directly involved in the negotiations on rewriting New York State's general permitting regulation (6NYCRR Part 201). SBTCP was able to convince the regulatory agency that a three tiered system was better than a single permitting approach to all businesses. As a result, there is a system of registration for minor sources that simplifies permitting with a one page, no calculations form; a general permit application for sources that can cap out of Title V; and a Title V application for major sources. The regulatory structure eases the paperwork requirements for many small businesses.</p> <p>The Ombudsman worked with the NY State Department of Environmental Conservation to draft a voluntary compliance policy. Although the redrafting of the permit rule prevented the Ombudsman from conducting an outreach mailing on NY State's voluntary compliance policy, over 100 sources came into compliance through the SBTCP.</p> <p>The Environmental Ombudsman's office developed a database of Small Business Assistance Groups (SBAGs) that include: chambers of commerce; trade associations; educational institutions; federal, state, local, and county governments; economic development agencies; planning boards; consultants; attorneys; and many others. This list includes over 2,100 listings and is used to multiply the effect of outreach. As an example, one chamber of commerce in Syracuse represents over 1,800 members and a sampling of 43 SBSGs shows over 100,000 businesses are reached by the multiplying effect of the information provided to these groups. An important aspect of this is a close working relationship between the multiplier and the SBO. The Ombudsman's Office works on establishing and maintaining this interaction so that the SBSG has a good understanding of what services the SBTCP can provide.</p>

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
North Carolina	<p>A Permit Reform initiative in NC has resulted in the formation of a new Environmental Permit Information Center (EPIC) to answer questions of clients about all environmental permits and develop user friendly permit factsheets. This center is part of the Office of the Small Business Ombudsman.</p> <p>Developed a multimedia environmental compliance manual for wood furniture industry. Held several workshops to provide hands-on assistance to the wood furniture small businesses in NC.</p> <p>Small businesses continue to have a regular seat at the table as air rules and procedures are developed. This is accomplished by their participating on several Air Quality internal work groups as well as legislative work group on air toxics.</p> <p>Rule changes continue that will clarify present rules and regulations to limit permits to only significant air pollution contributors. A registration process is under discussion. Changes to the potential to emit definition and new emission factors will benefit many small businesses.</p> <p>A 100% increase in technical assistance including on-site assistance to wood furniture companies, service stations, dry cleaners, small boat manufacturers, metal plating companies, and others.</p>
North Dakota	<p>Certain advantages realized through the SBAP/SBO structure include: 1) Because the Department staff administering programs that affect small businesses are housed in the same building as the ombudsman, the SBO can conveniently visit the director of the air pollution control program (who is also a CAP member), the SBAP coordinator, or any member of the Environmental Health Section. This arrangement is conducive for informal and frequent meetings. 2) The ombudsman is invited to attend the Environmental Health Section Division Directors' meetings, which are held twice a month. This helps the SBO to be aware of media program developments and policy developments that may have an impact on small business. This also provides an opportunity for the SBO to present new concepts (e.g., self-audit policy) and also interjects small business perspective to pertinent issues. 3) The ombudsman serves as a clearinghouse for P2 documents for the Environmental Health Section.</p>

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Ohio	<p>SBAP provided on-site assistance to 109 companies. This resulted in assisting with 135 permit applications, which, most likely, would never have been submitted without the aid of the SBAP. The companies would have certainly received notices of violation from actual OEPA inspectors for these unpermitted sources. Although difficult to quantify, this assistance has saved each company anywhere from \$1,000 to \$10,000 in professional consulting fees.</p> <p>SBAP received special recognition in a thank you letter to OEPA Director Don Schregardus from the Printing Industry of Ohio (PIO) for SBAP's involvement in the ENVIROPRINT project.</p> <p>SBAP established good working relationships with the permitting and enforcement staffs of the 5 OEPA district offices and 10 local air agencies. The field office staff, which includes enforcement personnel, continue to refer companies to SBAP for assistance.</p> <p>SBAP played a major role in implementing OEPA's new fee system for non-Title V facilities. Introductory letters and SBAP brochures were mailed to 21,000 facilities in the air permit system. In addition to answering many calls, SBAP developed guidance for all OEPA field offices on how companies should correctly complete the new fee reports. SBAP continues to provide follow up support to help non-responding facilities.</p> <p>SBO's major accomplishments in 1996 centered on building solid working relationships with key state trade associations including: Printing Industry of OH, OH Small Business Council, OH Chamber of Commerce, OH Bakers Association, OH Cleaners Association, OH Cast Metals Association, OH Chemical Council, National Federation of Independent Businesses OH, Automobile Service Association of OH, OH Petroleum Marketers Association, and OH Council of Retail Merchants.</p> <p>Based on the contacts made during 1996, SBO expects significant outreach to member businesses in 1997.</p>
Oklahoma	ECOS Award for the Customer Assistance Program.
Oregon	<p>Pollution Prevention Outreach Team Best Management Practices for the Automotive Industries. Dry cleaners workshop. Initiation of a Pollution Prevention Tax Credit Program. Initiation of a Dry Cleaner Pollution Prevention and Contaminated Site Cleanup Program. Laid groundwork for Cross-media Pollution Prevention Green Sticker Program. SBAP-PPRC Commercial Printing Compliance and Pollution Prevention Workbook. SBAP-Small Business Development Center Education Project. Sponsored EPA-University of Tennessee satellite teleconference on wood furniture manufacturing. Improved communications with vendors, community colleges, and trade groups.</p>
Pennsylvania	N/R
Puerto Rico	We are trying very hard to get this program 100% effective even though we don't have the SBO and CAP here to help us. Every small business we help counts as an accomplishment.
Rhode Island	The RI Pollution Prevention Conference and Exposition attracted over 700 people in late October 1996. The conference provided Clean Air Act, SBO, and SBAP information on a large scale.

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
South Carolina	SBAP has been recognized by other media programs within the Agency as a valued resource for working with the regulated community. Strong relationship developed with BAQ Compliance/Enforcement group that has resulted in increased awareness of small businesses' financial situation. SBO has been chosen to take lead in developing a small community technical assistance/outreach program for Agency.
South Dakota	N/R
Tennessee	A program staff person was on a panel of national experts for a chrome plating national teleconference. TN's chrome plating manual was used as the document to accompany the national chrome plating teleconference. Efforts with printers have resulted in registration and exemption from permit requirements for 18 printing facilities. SBAP Program Manager serves on the Advisory Board for the state's Small Business Development Centers. TN's Air Pollution Control Board, which has the authority to establish the program's funding level, has been complimentary of program efforts following program update presentations. Workshop evaluations indicated the participants found the workshops to be good or excellent. TN Association of Business complimented activities conducted by the program. National teleconference efforts were initiated by TN on regulatory compliance for small business. These teleconferences targeted the first small business industry groups regulated under the 1990 CAAA, which include dry cleaners, chrome platers, and vapor degreasing facilities.

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Texas	<p>Spray booth demonstration project. SBAP received a grant from EPA to demonstrate a low-cost automotive spray booth in El Paso. The project helped auto body repair shops from Mexico and the U.S. learn how to reduce waste and comply with environmental regulations.</p> <p>SBAP helped develop a rule that will eliminate date stamping of cosmetics, windshield wiper fluid, etc. Businesses will comply by printing on the label, "This product was produced in compliance with state of Texas laws." Manufacturers will save \$200 to \$400 per batch. It will no longer be necessary to buy stamping machines at a cost of \$10,000 to \$15,000. Companies that could not afford the machines will not have to hire employees to stamp products by hand.</p> <p>To encourage voluntary compliance, SBAP helped develop an amnesty program for the wood products industry. The program, which began January 1, 1996 and runs through August 31, 1997, allows small businesses in this industry to comply without fear of penalties. We received inquiries from 388 businesses interested in participating in the amnesty program. As a result of our efforts, a standard exemption for the wood products industry is being created to streamline compliance requirements.</p> <p>The Environmental Management Systems Grant will give small businesses a simple tool to identify environmental costs associated with their businesses and an immediate way to reduce costs and help the environment at the same time.</p> <p>The U.S. General Store Grant will provide small businesses with a plain language informational brochure on how to use the internet; hands-on Internet training; and a system of web home pages to help them identify ways to minimize waste, comply with environmental rules, and prevent pollution.</p> <p>The RCRA Grant will provide on-site technical assistance to small businesses on ways to reduce their hazardous waste generation and teach them to complete the necessary waste forms.</p> <p>The Texas-Mexico Border Region Grant will expand pollution prevention and compliance to support Spanish speaking small business owners in the Texas-Mexico border region.</p>

TABLE F-3
(Continued)

PROGRAM	ACCOMPLISHMENTS
Utah	<p>Establishment of Permitting de Minimis: SBAP initiated the establishment of a permitting de minimis, or minimum permitting level, for small sources in this reporting period. Up until the proposed de minimis rule, all sources of air pollution were required to submit a permit application, known as a Notice of Intent (NOI) to obtain an Approval Order (AO). After submitting a NOI, most smaller sources were not required to obtain an AO, since pollution control options were deemed economically unfeasible during the engineering review. Recognizing that the NOI requirements were time-consuming and expensive for small businesses and served no environmental benefit, the SBAP initiated a permit streamlining effort. The first phase of the permit streamlining effort was the permitting de minimis. The permitting de minimis rule was adopted at 500 pounds/year per Hazardous Air Pollutant (HAP) or 2,000 pounds/year for a combination of HAPs and 5 tons/year for any of the criteria pollutants. A Registration Notice was established for small sources in non-attainment areas. SBAP currently is developing the Registration Notice form, worksheets, and factsheets.</p> <p>P2 Training Workshop for Air Quality Permit Writers: SBAP collaborated with Department of Pollution Prevention Program (P2 Program) to develop a P2 training workshop for Division of Air Quality permit writers. Funding for the training program was provided through a grant from the P2 Program to SBAP. A pilot study will be conducted following the training to maximize the effectiveness of the training and to evaluate the effectiveness of incorporating a P2 approach into a small business' air permit, known as an Approval Order.</p> <p>The P2 training program is an essential step in DAQ's goal of promoting P2 in the permitting process. P2 training will provide the New Source Review (NSR) engineers with an understanding of P2 concepts and examples of practical applications. With this knowledge, NSR engineers will have the expertise required to promote P2 in both the pre-issuance and permit development phases of the permitting process. The training workshop is scheduled to be delivered in February 1997.</p> <p>Small Business Compliance Policy: SBAP initiated the development of a Small Business Compliance Policy and Penalty Mitigation Rule this reporting period. The purpose of the policy is to clarify the responsibilities of the SBAP and Division of Air Quality's Compliance Section when providing compliance assistance to small businesses and to provide provisions for evaluating penalty assessments to small businesses. The policy is consistent with EPA Small business Enforcement Policy, EPA Self Audit/Self Disclosure Policy, Senate Bill 84 and Senate Joint Resolution S.J.R. 6, and the 1990 CAAA.</p> <p>Newsletter: Introduced first edition of "Air News" newsletter with total circulation of 3,500 copies to small businesses, agencies, higher education, trade associations, libraries, etc. The first edition was introduced in fall 1996 with the "Utah Small Business Environmental Resources" list, which provides statewide contacts for environmental issues.</p> <p>Scoping Activity: A Small Business Scoping Activity was conducted on December 12, 1996, which is an element of the EPA Small Business Leadership's "Partnership for Compliance" Grant. This grant was awarded to the Division of Air Quality. Representatives from various small businesses, agencies, and organizations participated in the activity to identify barriers to achieving compliance with environmental regulations. Information gathered at the scoping activity will be used for "Partnership for Compliance" outreach activities.</p>

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Utah (cont.)	<p>Clear the Air Awards: The first annual "Clear the Air" awards program was conducted with the Salt Lake City Rotary Club and Utah's Lt. Governor in January 1996, which honored over 30 businesses, individuals, organizations, and government entities for their efforts to reduce air pollution. The second annual "Clear the Air" awards program nominations and outreach/educational campaign was launched in fall 1996, while awards will be given again in January 1997.</p> <p>GIS Ozone Visualization: A special 3-dimensional topographical video was created in coordination with Utah State University's award-winning Space Dynamics Laboratory. The 2-minute video publicly debuted with the Salt Lake Rotary Club in conjunction with the "Clear the Air" awards program. The video was picked up by a local television station, and discussions are currently underway to conduct daily ozone forecasts as part of weather reports as well as to produce educational videos on Utah's air quality conditions for statewide distribution.</p> <p>Consulting Engineers' Roundtable: An annual multimedia roundtable conference has been coordinated with the Division Executive Directors for open dialogue with and material distribution to engineers who work with Utah businesses. This event is held annually in January as a precursor to the state legislative session. Approximately 60-80 engineers attend and participate.</p>
Vermont	<p>Although this report may not reflect a great deal of activity for 1996, the fact that a full time employee was hired in December as a Small Business Compliance Advisory Program Engineer is a huge step forward in Vermont's effort to comply with the Clean Air Act's requirement for a Small Business Assistance Program. This new position should satisfy the SBAP portion of the overall program, and a CAP is almost complete (as of February 1997). Discussions on how to satisfy the Ombudsman requirement have begun, but there is no clear indication of how this is going to be accomplished at this time. As intended in Vermont's legislation, our program is multimedia in nature, covering the regulatory programs across the Department of Environmental Conservation.</p>
U.S. Virgin Islands	<p>I would like to get more training through the Peer Match Program so that I may be better equipped to make presentations at seminars or workshops. Need a better understanding of just what this is all about. Need staff to be hired that regular inspections can be done. Need additional funding to get all this done. Was approved to peer match with California by Karen V. Brown, however, this has not taken place as of 1/10/97. (Marylyn A. Stapleton, SBTAP Coordinator)</p>
Virginia	<p>SBAP is very proud of the receipt of a \$150,000, 3 year Leadership Grant to explore and provide compliance assistance and P2 information through the Internet.</p> <p>SBAP participated in fostering the creation of legislation to establish a revolving loan fund from which small businesses can access capital for CAA regulatory compliance and P2 activity.</p> <p>SBAP is proud of the project association with EPA's Office of Compliance Chemical, Commercial Services, and Municipal Division to develop a mentoring program for Korean dry cleaners through the Greater Washington Korean Dry Cleaners Association and also the production of a compliance video highlighting the most common areas of non-compliance while depicting an EPA Enforcement Inspection. Hopefully, both will be able to be used on a national basis.</p>

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Washington	<p>ECOLOGY CRO: 1) Enforcement avoided through technical assistance. DeAtley Company's portable rock crushing operations have had a number of compliance problems. Enforcement meetings produced an agreement whereby training would be provided in lieu of a penalty action. A workshop was conducted and attended by approximately 85% of DeAtley rock crushing unit employees, including management and crusher operators. Client evaluation: Evaluation forms returned rated the workshop from good to very helpful and very useful. All responses to the question, "Do you thing this is a good way for regulators to provide information to your company?" were positive. 2) Technical assistance encourages pollution prevention beyond legal requirements. Wells and Wade Fruit Company requested permission to burn several hundred fruit bins. Although such burning is allowable, Ecology believes recycling and reuse are preferable. Ecology staff researched and located a number of woodwaste recyclers willing to travel to eastern Washington and provided a list of companies to Wells and Wade. This technical assistance resulted in disposal of the bins through chipping and recycling instead of burning. Client evaluation: Client reported to staff that the transaction had worked very well. Appreciation for extra assistance in research and phone calls were expressed. 3) Technical assistance encourages voluntary compliance. Land clearing and construction projects generate numerous dust complaints during the dry season in eastern and central Washington. In response to a particularly difficult construction season, staff developed a focus sheet targeting air pollution prevention on building and construction projects. This focus sheet will be made available through local building and planning departments. So far, one local agency has agreed to attach the focus sheet to their building permits. Client evaluation: The local agency mentioned above agreed it may help encourage voluntary compliance.</p> <p>YRCCA: 1) Feedlots: A series of meetings was held with operators to discuss complaints, concerns, and the opinions for a dust control abatement process. Procedures were suggested for voluntary compliance to clean air standards regarding these agricultural operations. 2) Dairies: Reviewed available options for controlling manure/wastes for odor emissions including spray fields, agricultural zones, insect control/reduction and dust abatement measures. Met with representatives of technical firms that offer various solutions for manure problems. 3) Construction dust: Conducted several monthly meetings/hearings on dust control policies/procedures that will mitigate concerns created during the course of construction (i.e., blowing dust from dirt piles, excavation or extrication activities, and demolition projects). We're establishing a permitting process for requiring dust control measures within each of the 14 municipal jurisdictions located within our region. Developed written plans/policies for implementing these requirements along with the accompanying informational booklets and brochures defining/describing these regulations. Currently under review are the distribution methods for getting these handouts to the public contractors with several different options being considered. An arena also being explored is the cost sharing of the publishing expenses for these handouts with various entities and representatives from the construction trades. 4) Agricultural Wood Burning Reduction: Expected to be the main focus for our 1997 BAP activity. Preliminary studies indicated that orchard pruning or tree removal and grafting operations provide a fuel load that when incinerated makes an enormous contribution to the PM 10 level within our jurisdictional boundaries. Based upon even the most preliminary figures, indicators show a definite need to develop alternatives against the agricultural burning of wood wastes. Included in this program will also be open field burn off; road, fence, and irrigation right of way weed control by fire; and the burning of old fence, hop, and grape posts that have been treated chemically against wood rot. 5) Gasoline Vapor Compliance: Targeted area retail and wholesale distributors advising them of the upcoming future compliance regulations for the distribution/marketing/production of gasoline. Reviewed existing procedures for implementing the new policy requirements as they are adopted.</p>

**TABLE F-3
(Continued)**

PROGRAM	ACCOMPLISHMENTS
Washington (cont.)	<p>6) Asbestos Program: Developed and implemented a standardized county-wide approach for the proper removal or disposal of asbestos containing materials. Established policies and procedures for identifying, defining, and enforcing state/federal mandated requirements for abating any asbestos problems in residential and commercial dwellings. Identified those licensed contractors for providing asbestos removal or stabilization work.</p>
West Virginia	<p>SBAP has continued periodic meetings with various other agencies and organizations that provide environmental compliance and pollution prevention assistance to businesses (small to medium sized). The intent has been to increase the effectiveness of the individual programs by extending the client bases and coordinating efforts to assist these clients. These groups include: WVDEP Pollution Prevention Services; WVDEP Waste Minimization; The Marshall University Center for Environmental, Geotechnical, and Applied Sciences; The Marshall University Procurement Technical Assistance Center; The Robert C. Byrd Institute for Advanced Flexible Manufacturing; The West Virginia University Industrial Extension Service; and the National Institute for Chemical Studies (NICS).</p> <p>Work on a joint outreach/informational brochure has been completed and 2,000 copies distributed to the members. In addition to the groups noted above, the brochure also references the WV Partnership for Industrial Modernization (WVPIM) and the National Technology Transfer Center (NTTC). The group has loosely termed itself the "WV Environmental Coalition" and has started work on a multimedia environmental awareness poster for its next project.</p> <p>SBAP has committed to devote two people for developing general permits, particularly for the coal industry. Other materials-handling general permits should be developed later in the year. Intensive outreach to dry cleaners to assist with compliance certification and record keeping was initiated in the fourth quarter. WV was one of the first states in Region III to recognize that the Municipal Solid Waste NSPS would impact businesses that meet the Section 507 definition of "small." Subsequently, outreach was done and a workshop was conducted on the new requirements.</p> <p>SBAP has been working with the enforcement group to develop less intimidating and simpler forms when violations are discovered. Although a "field citation" form has been developed, it has not yet been approved by the Chief.</p> <p>SBO has developed a Revolving and Low Interest "Small Business Environmental Loan Program," which has received an enthusiastic endorsement by the chief of the WV Division of Environmental Protection (WVDEP) and the WV Senate Small business Committee. This bill will be presented to the 1997 legislature.</p> <p>SBO also has convinced the Director of DEP to study the merits of consolidating small business inspections performed by the various offices within the WVDEP. For example, service stations are inspected by the Office of Air Quality, the Office of Water Resources, and the Office of Waste Management. It is proposed that since the Office of Waste Management has most of the "concerns," they should become the lead office and perform all the inspections.</p>
Wisconsin	N/R
Wyoming	N/R

APPENDIX G

COMPLIANCE ASSURANCE ISSUES

**TABLE G-1
COMMON COMPLIANCE PROBLEMS**

COMPLIANCE PROBLEM	# PROGRAMS	% PROGRAMS
Not understanding regulatory requirements	28	53
Operating without a permit	26	49
Incomplete record keeping	16	30
Uncertain of permitting requirements	14	26
Uncertain how to determine emission inventories/general lack of technical experience	12	23
Financing for control requirements	10	19
Uncertain how to complete forms/complicated paperwork	10	19
Operating outside NSPS or MACT	10	19
Improper storage/disposal of hazardous waste	7	13
Fear of regulatory agency/arbitrary regulatory enforcement	6	11
Failure to use/finding the right equipment/technology to comply with applicable standards	6	11
Confused over multiple permitting requirements/need for multimedia permits	5	9
Overwhelmed by quantity/complexity of regulations	4	8
Uncertain as to which government agency to contact/when to contact	3	6
Lack of sufficient notification by or getting accurate information from regulatory agency	2	4
Non-compliance since risk of inspection and penalty seem remote	2	4
No manifest for special or hazardous waste	1	2
Labeling of storage areas	1	2

* County and regional programs not counted separately.

**TABLE G-1
(Continued)**

PROGRAM RESPONSES

Programs were asked for information on the most common compliance issues addressed during the course of providing technical assistance. Individual program responses are listed below. Comments are edited for space.

PROGRAM	COMPLIANCE ISSUES
Alabama	General lack of understanding of regulatory rules and requirements.
Alaska	<p>Dry Cleaners: Of the dry cleaners visited, only one was tracking their 12 month rolling perc purchase total correctly. Most ask why a calendar year was not selected. Second-most common problem is recording of inspection. The dry cleaners are inspecting as required, but some only write down the inspections if there was something wrong. Did not realize they had to record all inspections, even if there were no problems discovered.</p> <p>Auto Shops: Usually, the most common problem is associated with labeling and storage of used oil.</p> <p>Since most of the small businesses do not have a Title V air permit, there has not been a lot of issues with compliance at this time. Most of the SBAP's effort is to notify businesses of the upcoming Title V application deadline and help them determine if they need a permit, an enforceable limit to avoid a permit, or if they are even covered by Title V.</p>
Arizona	Operating without a permit. Operating without control device, such as paint booth, baghouse, etc. No records of chemical usage or other records.
Maricopa Cty	Our primary obstacle has been bringing businesses into compliance. Many businesses that should have an air quality permit are still operating without one. As a non-regulatory program, we can only work with sites to bring them into compliance voluntarily. Our program is funded by air permit fees.
Pima Cty	Difficulty in understanding regulations. Difficulty in completing required permit applications. Difficulty with PTE concept. Uncertainty whether proposed revisions are minor or major. Requirements for synthetic minors. Recordkeeping requirements (especially for dry cleaners).
Arkansas	With respect to metal fabricators, a lot of business owners have been unaware of how to get rid of hazardous waste materials (sludge). Companies do not understand regulations and cannot take the time to understand, so requirements, such as annual usage reporting, slip through.
California	Since our Local Air Districts issue the permits, this is largely inapplicable at our state level. Our workshops with those we regulate prior to rule adoption are well attended and have excellent participation.
Kern County APCD	Difficulty keeping records, which shows the facility is operating in compliance with our rules. For a rule to be US EPA approvable, recordkeeping requirements are pretty onerous!

**TABLE G-1
(Continued)**

PROGRAM	COMPLIANCE ISSUES
Placer County APCD	This answer applies to auto refinishing, dry cleaners, cabinet shops, and printing companies. Small business sources have never had to be concerned before about air permits. There is much confusion about difference between Air District requirements and Hazardous Waste requirements. They need more than one explanation and sometimes they don't want to understand. Most small shops have no one person assigned to basic permitting and recordkeeping duties. In general, the Air District is perceived only as a fund-raising entity in government, charging "excessive" fees for no tangible product. Most shops contacted have very limited staff and operating cash. We have attempted to counteract these impressions with workshops, offers of assistance with forms, and in general, trying to be patient with them.
Santa Barbara APCD	Whether or not a business needs an APDC permit. Lack of understanding of the permit process. How to keep records in accordance with rule and permit requirements. Finding the right equipment and/or technology to comply with applicable standards. Finding appropriate alternatives to solvents.
SCAQMD	Dealing with the cost of control technologies, especially for low emitters. Recordkeeping for regulatory agencies is too laborious. Takes too long to obtain a permit to construct.
Colorado	Lack of understanding about regulatory requirements. Lack of resources to implement control technology.
Connecticut	Difficulty in staying on top of the overwhelming number of regulations that apply to small businesses. The importance for regulatory agencies to ensure that a level playing field is maintained. Non-complying facilities should not be rewarded and that high performing facilities should be recognized as such. Pieces of equipment/processes that require minor permits. Confusion over how to meet recordkeeping and reporting requirements required by the regulators. Confusion over state and federal regulations and areas where they overlap. Notification and testing requirements.
Delaware	Most common problem expressed by most industry sectors is that they do not understand the regulations, because they are poorly written and overly complicated. Most do not know whether or not they need a permit to construct or operate. Much confusion about Title V and properly completing permit applications.
District of Columbia	Lack of permit for new equipment. Not knowing when and why to notify the regulatory agency. For instance, do not know whether to notify agency for change of ownership or installation of new equipment.
Florida	Compliance assistance is conducted by the Department's district air inspectors. This past year, the Department created a general air permit program for area sources. Many area sources are small businesses. Inspections of these area sources began in late 1996. Reporting analysis is not complete or available until the electronic database is completed. However, information from the CFC program shows that recordkeeping was the most frequent non-compliance issue.
Georgia	Two areas that we have identified are inadequate recordkeeping and facilities operating without permits.
Hawaii	Technical assistance provided involved issues related to the interpretation and understanding of the regulations and permit requirements.
Idaho	N/R

**TABLE G-1
(Continued)**

PROGRAM	COMPLIANCE ISSUES
Illinois	<p>Unpermitted equipment in manufacturing and metal parts fabricating (operating permits-air; pollution control device permits-air).</p> <p>Waste: no manifests for hazardous and special wastes.</p> <p>Auto repair: not air conditioning/Title V certified. Some have air permits but not land permits.</p> <p>They need multimedia permits. The cost of coming into compliance. Lack of understanding. Fear of the regulatory agency.</p>
Indiana	<p>Constructing or operating without a permit. Uncertain of permitting requirements for new and existing businesses. Uncertain of other requirements (OSHA, DOT, etc.) that they need to follow. Uncertain of the regulations, don't know what they need to do in order to be in compliance. Overwhelmed by the regulations, especially where there are overlapping regulations (either multi-media such as air, water, and waste regulations or regulations of OSHA, DOT, Fire Marshall, etc.). Uncertain of which government agency to contact. Not understanding the need for permits by both state and local agencies; believe that having one permit will cover all requirements. Dry cleaners uncertain how to comply with new standards required by Dry Cleaners NESHAP. Dry cleaners don't know how to figure solvent mileage. Don't know what VOCs are or how to track VOCs. Operating outside of MACT requirements. Lack of notification by the agency of rules that will impact businesses. Uncertain of how to properly keep records. Fear of regulatory enforcement. Heating/cooling industry uncertain of what to do with old mercury thermostats (or mercury bulbs). Uncertain of what to do with used fluorescent light bulbs, oil, antifreeze, and other misc. products.</p> <p>RE Title V: Uncertain of permitting requirements. Don't understand that they can drop from one tier of the program to the next (to ease the permitting and fee requirements). Don't know how to calculate emissions. Uncertain of how to complete the application. Uncertain of compliance monitoring requirements. Uncertain of due dates for applications and fees.</p> <p>Various questions regarding: TRI reporting and compliance, Universal Waste Rule, Voluntary Remediation Program, MACTs.</p>
Iowa	<p>Nearly all clients need to get New Source Review permits (also known as construction permits). Many need assistance with Emission Inventory development; applicability determination with Title V, NSPS, and NESHAP; and recordkeeping, completing forms, responding to inquiries from regulatory agencies.</p>
Kansas	<p>The overwhelming majority of facilities are willing to comply. One common problem for manufacturers is distinguishing between the various environmental enforcement agencies (county or local, KDHE, and EPA) and offices within each of these agencies. As a result, some believe they are in compliance for all their environmental issues even if a regulatory inspection was done on a limited scale. Lack of understanding of regulations also is a common problem. Generally, there continues to be frustration from people who have been given environmental responsibilities without adequate training and resources.</p>
Kentucky	<p>SBAP has assisted facilities that did not have construction and operating permits, whose emissions were exceeding legal limits, and others that were not aware of Title V permitting requirements.</p>
Jefferson Cty	<p>The most common compliance problem has been lack of permits and reporting. Most small businesses in Jefferson County are not out of compliance with present air quality standards.</p>

TABLE G-1
(Continued)

PROGRAM	COMPLIANCE ISSUES
Louisiana	Understanding new rules and regulations. Understanding and completing emission inventories and permit applications.
Maine	Not knowing they were subject to certain regulations. Not understanding regulatory requirements. Not having necessary permits. Problems are across all industry sectors.
Maryland	Lack of information, lack of paperwork (permits, recordkeeping).
Massachusetts	<p>Generally, compliance problems have been the same as previously identified: lack of awareness of regulations and lack of understanding of the rules when awareness does exist. The increase in technical assistance/compliance assistance (TA/CA) activities has increased both awareness and understanding. However, information we have received from business indicates there are problems associated with enforcement also.</p> <p>1) Companies are reluctant to come forward for fear of enforcement activity if regulatory agencies become aware of a situation of non-compliance. 2) Companies, especially in small business sectors, do not feel compelled to go to the effort of coming into compliance, because the risk of inspection and penalty seems remote.</p> <p>Industry-specific compliance information is being compiled for some industry sectors with which we are involved in TA/CA projects. For example, of the 100 DEP inspections conducted of printing facilities in conjunction with MP2 project, the five most commonly cited areas of non-compliance were problems with hazardous waste regulations such as 1) failure to properly label the hazardous waste storage area, 2) failure to list start of accumulation date on drum label, and 3) failure to keep all VOC-containing materials tightly covered at all times.</p>
Michigan	<p>In Michigan, there is a tremendous volume of governmental regulation that business must comply with on a day-to-day basis ranging from environmental (e.g., air, land, water, and waste permitting; fire safety issues; etc.) to labor force issues (e.g., OSHA regulations). For some, it is overwhelming; there are not enough hours in the day to stay on top of all these requirements.</p> <p>The states' SBAPs should be or are synthesizing these regulations/requirements into more simple and understandable terms for such businesses. To address this issue, Michigan, like other states, is in the process of developing handbooks for specific industries (e.g., dry cleaners, auto body industry, etc.) that contain a comprehensive, yet simple organization of the requirements.</p> <p>One compliance issue that seems to resurface constantly is where to find the right piece of pollution control equipment to achieve compliance with a state or federal regulation.</p>
Minnesota	New businesses having difficulty in getting a comprehensive information package that includes all media and extends beyond MPCA rules to OSHA, ERC, counties, etc. New permittees having difficulty in keeping up with recordkeeping and calculations required for compliance with permits. People not understanding the permitting program and how it applies to their facility.
Mississippi	<p>Dry Cleaning Industry: Incomplete reports and operating outside of regulation (MACT).</p> <p>Dry Cleaning Industry-Petroleum NSPS: Incomplete reports and operating outside NSPS.</p>

**TABLE G-1
(Continued)**

PROGRAM	COMPLIANCE ISSUES
Missouri	The Missouri Department of Natural Resources' Technical Assistance Program is multimedia and receives requests for all types of environmental compliance assistance. In regard to requests for assistance relating to the Clean Air Act, Emissions Inventory Questionnaires (EIQ), construction and operating permit assistance ranks at the top. Many small businesses have never completed an EIQ and request our assistance. Other requests are from facilities that were not aware they needed a construction permit before they installed their equipment and subsequently received a "notice of violation" (NOV) when they were inspected by the department's air inspectors. These facilities are referred to us for assistance in completing an application for a construction permit. Others request assistance in completing their construction permit applications before installation. The operating permit is a new requirement for Missouri's small businesses and they have been requesting training and assistance in completing these applications.
Montana	Non-compliance with MACT standard reporting deadlines. Failure to use totally enclosed, filtered, and ventilated spray booths in body shops and some small manufacturing operations. Poorly maintained equipment. Poor hazardous material and waste management practices.
Nebraska	The most common compliance problem for small business is not knowing or being unsure of what their obligations are under the regulations. Typical type of assistance is to provide a site visit to identify the waste streams, determine the Potential To Emit, work through the actual emission factors, and assist in filling out applications for permits. In the process, Pollution Prevention Opportunity Assessment is provided along with technical assistance where needed.
Nevada	SBAP finds that companies do not understand regulations or the regulatory process and are often operating without a permit. Depending on the providers, the counties have more "urban" problems. For example, a person complained about permit conditions, but he didn't understand 40 CFR Part 60 on New Source Performance Standards (NSPS).
Washoe Cty	The most common compliance problems associated with air quality in Washoe County are in order: dust/tracking/no water on construction sites, odors from industrial operations, burning/smoke, and asbestos.
Clark Cty	There are a number of facilities that do not have proper "Authority to Construct" or proper "Operating Permits." Sometimes, inspectors encounter facilities with excess emissions. When these events are discovered, notices of violation are issued, calling for either corrective action and/or proposing penalties to be assessed by the APC Hearing Board.
NV BAQ	In the early 1990s, BAQ issued 1 permit for each emission unit. In response to complaints from the regulated entities, BAQ consolidated these permits into 1 facility-wide permit that eliminated a lot of redundant language. BAQ also worked to improve the language and requirements contained in the permit to help owners and operators with understanding the permit process.
NV BEP	BEP has not identified any trends at this time. However, they have only been providing services since September 1996.
New Hampshire	Not understanding regulatory requirements. Operating without a permit or a determination that a permit is not required. Improper classification and/or disposal of hazardous wastes.
New Jersey	Permit problems: Not up to date, lack of, too high Potential To Emit, etc.
New Mexico	Most facilities needing SBAP assistance lacked permits.

**TABLE G-1
(Continued)**

PROGRAM	COMPLIANCE ISSUES
New York	Typical problems, consistent across industry sectors, include: Unaware of applicable regulations. Not having a valid operating permit. Unable to understand permit application. Businesses often lack the financial resources to comply with regulations. Businesses are frequently under the impression that if they apply for and are issued one permit, they are in compliance with all requirements. (For example, many businesses are in compliance with the NY City Department of Environmental Protection regulations, but do not have a state permit.)
North Carolina	Unpermitted facilities. Confusion about whether an air quality permit is required. Businesses lack the technical expertise to identify air pollutants, emission sources or points, and calculating emissions. The number of facilities needing a permit or not complying with air quality regulations is unknown.
North Dakota	The most common problem is small businesses understanding the regulations. Regulations need to be written in a manner that is much easier to understand. EPA should change their "Once In-Always In" policy for MACT standards.
Ohio	<p>The most common compliance problem has been lack of permits. Approximately 10% of those who received on-site assistance had permits. Lack of permits is the most common violation found by inspectors, and correcting this is the main focus of SBAP assistance efforts. Companies also report problems with understanding regulations, redundant reporting and recordkeeping requirements, and getting straight answers from the regulatory agency.</p> <p>Many companies also felt the OEPA could do more proactive outreach and education or otherwise provide a single avenue for companies to get regulatory information.</p> <p>It appears small businesses in some heavily regulated industry sectors (e.g., chemical) benefit from a "trickle down" understanding of environmental regulations from their larger competitors. Other less regulated sectors, like dry cleaning and printing) do not seem to have such a benefit. SBAP received very few assistance requests from chemical companies.</p>
Oklahoma	The major problem we encounter is a facility that is unpermitted for air emissions. We are working, as an Agency, towards addressing noncompliance through more common sense approaches to regulation. The most common reason people are out of compliance with air permitting requirements is ignorance to the rules, which they may ignore because they do not understand them or they are too burdensome as far as time commitment.
Oregon	Don't understand regulations. Operating without proper permits. Inadequate or no records. Not submitting Form R, TRI reports. Have not calculated emission levels. Employees not trained to practice P2. Improper waste disposal (e.g., evaporating solvents to avoid RCRA). Don't understand pitfalls of cross-media transfer of pollutants. Lack knowledge of alternative, less polluting technologies. Failure to seek technical assistance to avoid non-compliance.
Pennsylvania	Missing plan approvals or permits due to grandfathering of sources. Vapor degreasers in relation to MACT.
Puerto Rico	Incomplete reports, lack of knowledge on compliance matters, translation of rules and documents related to environmental matters. Getting into compliance sometimes may be too expensive (equipment, paperwork, etc.). Permit requirements from other offices.

**TABLE G-1
(Continued)**

PROGRAM	COMPLIANCE ISSUES
Rhode Island	Lack of knowledge regarding the requirements of the air regulations generally result in lack of permits for equipment, violations of VOC limits, and violations of HAP limits.
South Carolina	Operating without a permit, which is usually a result of a lack of knowledge of regulatory requirements or the fear of regulatory agency and associated costs of compliance.
South Dakota	South Dakota has not experienced a compliance problem with small businesses.
Tennessee	Not understanding how to complete permit forms. Dry cleaners not understanding required controls. Not knowing which government agency to contact. Financing options for control requirements. Not knowing better operating options including less toxic solvent substitutions.
Texas	<p>Waste: Businesses are not aware that they need to notify TNRCC about how they handle their waste, that they need to classify their waste, and that there are limits on how long they can store hazardous wastes on site.</p> <p>Air: Businesses are not aware that they cannot create a nuisance and that they need to have a permit or standard exemption before they begin construction of their facility.</p> <p>Foundries: Opacity exceeded.</p> <p>Dry Cleaners: Businesses are confused about the difference between chillers and refrigerated condensers.</p> <p>Auto Body: Businesses are not aware that they need standard exemptions, are not aware of stack height requirements, and are not aware of ventilation requirements.</p> <p>Miscellaneous: Businesses feel that paperwork is too complicated. They have to hire a consultant. Businesses do not have the necessary funds to meet compliance regulations.</p>
Utah	<p>Permit Streamlining Needs: Many small businesses do not have the necessary air permits, known as Approval Orders, to discharge emissions into the ambient air. Businesses are either unaware of the requirement or lack the knowledge or terminology to understand permitting requirements, and therefore do not obtain necessary permits. Some businesses choose to ignore the permitting requirements and feel that there is a slim chance that they will be involved in a compliance action. The new permitting de minimis for the Division of Air Quality serves to simplify and clarify the permitting requirements for small businesses.</p> <p>Need for Multimedia Assistance: This issue has been identified by other state assistance providers at various forums, but its importance cannot be over-emphasized. In the course of providing technical assistance, SBAP staff are requested to provide assistance on other regulatory requirements and issues beyond just air quality. Most businesses view the "single media" assistance as an incomplete service, since businesses need to address other environmental compliance issues. Many states have addressed the need for multimedia assistance by developing "one stop" regulatory assistance centers for businesses. In Utah, SBAP established a working relationship with other Divisions to provide a more effective assistance package to businesses. Small businesses have benefitted from that relationship by receiving assistance referrals through SBAP to other Divisions in the Department of Environmental Quality.</p>

**TABLE G-1
(Continued)**

PROGRAM	COMPLIANCE ISSUES
Vermont	N/A
Virginia	<p>VA's compliance assistance efforts have been primarily directed at the source categories coming under regulation by MACT standards. A common compliance problem to date has been the difficulty of the foreign national ownership of the dry cleaners to fully grasp what is necessary for on-going recordkeeping. The most difficult concept continues to be that of the twelve month rolling purchase log. An alliance with EPA's Office of Compliance Chemical, Commercial Services, and Municipal Division to develop a mentoring program through the Greater Washington Korean Dry Cleaners Association and to produce a video is ongoing and highlights the problem compliance areas and seeking to eliminate them and foster continued and complete compliance.</p> <p>Last year's report addressed the issue of "operating without a permit." This continues to be an issue but, as last year, has only arisen several times. We continue to feel that "operation without a permit" will be an ongoing issue for VA, especially as we begin to provide additional permitting assistance outreach for Title V.</p> <p>The issue of compliance affordability has and will continue to be an issue. Hopefully with the development of a revolving loan program, the emphasis on this issue will diminish.</p>
Virgin Islands	None
Washington Ecology	Lack of understanding of air quality agency jurisdictions. Lack of understanding of environmental liabilities. Lack of understanding of interaction between regulations for each media (air, water, hazwaste). Hunting for answers from various staff and agencies that provide the easiest way out. Faulty operating and air quality control equipment.
BCCAA	Building device without minor new source review by government authority. Pervasive throughout all small business except dry cleaners and rock crushers. Letting air pollution control equipment deteriorate. Annual or once every five years inspections mitigate this. Trying to keep old equipment running beyond its natural life.
OAPCA	Lack of specific permits, particularly notices of construction. Incomplete reporting of required information.
SCAPCA	Recordkeeping. Modifications to facilities. Bringing new sources into registration process and bringing them "up to speed" on requirements. Air quality controls, control alternatives, etc.
SWAPCA	Lack of permits. Ignorance of the regulations.
YRCCA	Sources dislike regulatory authority and permitting fees. Regulatory jargon and complexity. Filling out permit applications.
West Virginia	The most common compliance problem this year has been in lack of state construction/installation permits when required. This may have as much to do with problems in our permitting rule(s) as it does with the regulated community. There have been considerable deficiencies meeting the dry cleaning MACT, mostly with monitoring/recordkeeping requirements. SBAP has exerted a tremendous amount of effort to follow up with dry cleaners who were identified by enforcement as having deficiencies.

TABLE G-1
(Continued)

PROGRAM	COMPLIANCE ISSUES
Wisconsin	Cost of new equipment or modifications required by environmental regulations. Concerns about the amount of time required to prepare applications for required permits or recordkeeping. Fear that regulatory enforcement may be arbitrary or capricious. Difficulty in completing required mathematical calculations to determine MTE and PTE. Too many regulations. Too much paperwork. "Where can I go to get help?"
Wyoming	Solvent users: Understanding MSDS and MACT standards.

N/A Not applicable
N/R No response

**TABLE G-2
IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE**

IMPROVEMENTS	# PROGRAMS	% PROGRAMS
More open communication between sources and regulatory agencies	30	57
Increased compliance	20	38
Greater understanding of the regulations	18	34
Reduced apprehension regarding environmental compliance	12	23
Improved attitudes about complying with regulations	12	23
Increased registration and permitting of existing sources	11	21
Improvement in pollution prevention management practices	10	19
Greater environmental understanding through on-site visits (versus phone calls or mailings)	10	19
Better record keeping	4	8
Involvement in regulatory development process	2	4
Recycling and reuse	1	2
Inclusion of environmental compliance early in business plans	1	2
Better hazardous waste disposal	1	2

* County/air district responses are included with state responses and are not counted separately.

**TABLE G-2
(Continued)**

PROGRAM RESPONSES

Programs were asked for information on the improvements in regulatory understanding and compliance. Individual program responses are listed below. Comments are edited for space.

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Alabama	This information has not been tracked by SBAP. From the SBO perspective, it appears that more business people are calling about possible environmental permit requirements and restrictions prior to making a full commitment to a new business venture.
Alaska	<p>All site visits have shown an improvement in compliance with regulatory requirements. In general, small businesses in Alaska want to ensure the environment remains clean. However, they are wary of talking to our Department. The main fear is enforcement and having to spend money they do not have in a short period to fix things.</p> <p>In general, most businesses are in compliance with the substantive parts of environmental regulations. They usually need assistance with recordkeeping and reporting requirements, assistance in filling out permit applications, or help with how to properly dispose of waste.</p> <p>The Compliance Assistance Office has been very well received by businesses and the communities around the State. The CAO offers its services enforcement-free, and thus creates a relationship of trust with businesses. Site visits focus on environmental benefits and business improvements, which often result in economic savings for the business. The enforcement-free site visits performed by the CAO provide businesses with the same level of review that they would get with an enforcement-related inspection. However, the visits are not overshadowed with fear of violations or enforcement actions and generally result in greater compliance. Additionally, the CAO promotes pollution prevention rather than end-of-pipe solutions. Where possible, we provide the business with modifications or recommendations, which result in reductions of pollutants, substitution of materials, and reduces potential for emissions that are regulated.</p>
Arizona	This year will bring a greater effort toward developing some metrics that will provide this type of measurement to determine how compliance has been affected by SBAP. Probably the biggest change is that now businesses have a place to go when they have a question regarding compliance.
Maricopa Cty	N/R
Pima Cty	Field Enforcement Officers have noted increased awareness and concern regarding abiding by regulations by the regulated community. Also, more inquiries about P2 techniques and processes. Finally, permitting staff have noted more complete air quality permit applications being submitted.
Arkansas	Businesses are very willing to change processes, eliminate wastes, etc. in order to provide a cleaner environment. As a result of our workshops and audits, businesses are relieved to hear common sense approaches to complying with regulations.
California	Our many publications and their wide distribution have greatly increased the awareness of regulatory requirements and who to contact to get help. Accordingly, the number of contacts has increased significantly. Our education efforts have resulted in significant improvements in self-compliance.

**TABLE G-2
(Continued)**

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Kern Cty APCD	They really appreciate being helped by us to comply.
Placer Cty APCD	We have noticed that about half responded positively to our attempts to assist. What they seem to appreciate the most is our willingness to try to convey the regulations and Permit Conditions in "plain English."
Santa Barbara APCD	The benefits of our business assistance activities include: a greater understanding/awareness of APCD requirements by regulated sources, a better working relationship between business and APCD, an understanding that we all are working together toward a common goal, timely responses to questions from regulated sources and the general public. How our Business Assistance Program helps our regulated sources is highlighted by work we recently completed with a local autobody shop. The shop's owner was very confused about the APCD's permitting process and what he needed to do to obtain an APCD permit. He also needed to obtain a building permit from the city to construct his paint spray booth. We were able to work with the building department and the shop owner to determine what was needed for the building permit and were able to assist him in completing the necessary APCD permit application forms. This source is now in the permitting process and is on his way to obtaining an Authority to Construct. Both the autobody shop and the APCD benefit - the autobody shop will soon be able to begin operating and the APCD knows the source is in compliance. A relationship has been established that should enable both parties to maintain communication and ensure continued compliance.
SCAQMD	Many dry cleaning operations have switched to dry-to-dry, refrigerated, closed loop systems without a regulatory requirement for this equipment. We worked through trade associations and suppliers to provide information. AQMD also worked through community banks to provide equipment financing and provide a guarantee. Also, many companies are switching to aqueous cleaners as a result of P2 contract to give them such assistance.
Colorado	Awareness of air regulatory requirements has improved. Less confusion in regard to who must apply for permits and how they must operate under the permits. More involvement by businesses in the formulation and updating of rules and regulations. More willingness of small businesses to seek assistance with their compliance issues.
Connecticut	<p>More sources are willing to seek regulatory assistance from a regulatory agency. More small businesses are getting involved in the regulatory development process. We expect to see increases in compliance rates for small business sectors targeted for assistance. We have had positive feedback that small businesses are less fearful of DEP. Also, more small businesses are availing themselves to P2 solutions at an earlier stage when P2 can be most effective.</p> <p>We have seen the relationship between the CT SBAP and representatives of several small business sectors develop and mature to a level where a meaningful dialog is occurring on a regular basis. This is resulting in a more effective dialogue with a number of small business sectors such as auto body shops and metal finishers, and the structuring of compliance assistance initiatives that are well designed to meet environmental goals in an efficient manner.</p>
Delaware	Businesses that have received assistance seem to be less hesitant in asking for help with other issues. After receiving assistance, they understand that the intent of the program is to provide assistance in meeting environmental regulatory requirements and not in assessing penalties or in some way limiting their ability to conduct business.

**TABLE G-2
(Continued)**

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
District of Columbia	After SBAP presentation at the Korean Drycleaners Association, I received a lot of requests for initial notification forms and letters notifying us of ownership and equipment change.
Florida	Since the general air permits for area sources are new this fiscal year, district personnel are still learning what the regulations are and how to use them in compliance assistance activities. Staff are not in the position to observe or to measure a trend in behavioral changes and environmental improvements.
Georgia	<p>To measure the effectiveness of the dry cleaner workshop, the audience was asked to complete evaluation questionnaires. The workshop's overall rating was 4.2 (the scale was 1-5 with 5 being the highest). The evaluation sheet also included the question: "How familiar are you with the dry cleaner air rules before the workshop and after the workshop?" The results from the 46 evaluations turned in were:</p> <p> "Before the workshop?" Very: 9 Somewhat: 30 Unfamiliar: 7 "After the workshop?" Very: 33 Somewhat: 13 Unfamiliar: 0</p> <p>The success of the workshop was determined by correlating the compliance rate of those that attended the workshops to those that did not. The eight dry cleaners that attended a workshop prior to the planned compliance assistance visit had a higher rate of compliance compared to those that did not.</p> <p>We are also tracking the number of facilities requesting compliance assistance visits to facilities inspected by the Enforcement Program. To date, we have completed 15 compliance assistance visits; however, the dry cleaners audited by the SBAP have not been inspected by the Enforcement Program after our visits.</p>
Hawaii	N/R
Idaho	A better trust and improved working relationship with industry has developed. DEQ now is looked at as an agency that will help to solve problems.
Illinois	<p>SBAP provides compliance assistance and information to small businesses. However, our best example of helping companies reach compliance status is through a project called "Clean Break." This is an amnesty project for small businesses that IEPA Office of Small business has sponsored and asked the DCCA SBAP to assist them in marketing and with client intake. Come companies that fear contacting the regulatory agency for assistance now have an option. Whether a client calls the IEPA Office of Small Business or the DCCA SBAP, they are encouraged to participate in Clean Break and receive a site visit by IEPA staff to confirm compliance or identify non-compliance issues. Once into the process, small business receives the support and information they need to reach compliance.</p> <p>The project is in its third project stage, now being available statewide to all companies with 200 or fewer employees. Governor Edgar announced this expansion in January 1997.</p>

**TABLE G-2
(Continued)**

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Indiana	<p>More businesses are in compliance due to increased communication and trust between businesses and CTAP (and also between businesses and IDEM's Office of Air Management and Office of Solid Waste & Hazardous Waste Management).</p> <p>Increased compliance due to assistance provided by CTAP and some of the regulatory programs within IDEM. Assistance includes: workshops, on-site assistance, phone assistance, brochures, manuals, meetings, workgroups, identifying training opportunities or associations that may be of assistance, etc.</p> <p>Request for additional compliance assistance workshops.</p> <p>Request by industry sectors for compliance assistance programs that are specific to their needs.</p> <p>Increased number of applications have been submitted to IDEM and permits issued to businesses due to increased awareness of the need for permits and due to the assistance provided by CTAP and IDEM's Office of Air Management.</p> <p>More businesses are developing and implementing necessary plans and training (spill prevention, haz com, etc.).</p> <p>Better recordkeeping due to IDEM's working with businesses to simplify the requirements and due to assistance provided to businesses.</p> <p>Improvements in P2 practices. Many businesses impacted by Title V implemented P2 practices to back out of the program.</p> <p>Increased recycling and reuse.</p> <p>Improved attitude regarding IDEM including a willingness to repeatedly call with questions and to encourage neighboring businesses to seek assistance (some businesses will call CTAP on behalf of other businesses that are fearful of contacting us).</p> <p>Positive feedback regarding IDEM's customer-oriented approach, including CTAP's offering assistance prior to new rules taking effect.</p>
Iowa	<p>IAEAP continues to have a steady backlog (~300 site visits and 100 permits). Direct mailing has been done to grain facilities, dry cleaners, manufacturers, auto body shops and received very good response.</p> <p>On-site visits have been integrated with technical assistance. Clients are provided assistance until they are in compliance or choose to remain out of compliance.</p> <p>SBO response: Without a survey or a thorough review of DNR records, it is difficult to know what percentage of the businesses contacted by the SBO have improved their compliance status. The DNR has a tracking list for construction permits, and it is always satisfying to see a company you have worked with submit a permit application.</p>

**TABLE G-2
(Continued)**

PROGRAM	IMPROVEMENTS IN REG' LATORY UNDERSTANDING AND COMPLIANCE
Kansas	SBEAP addresses these issues by providing assistance through university staff free of charge and in a confidential and non-threatening atmosphere. SBEAP staff provide comprehensive assistance in determining applicable environmental requirements as well as specific help with completing any needed permits and forms. Customers seem genuinely pleased with our service, describing it as beneficial use of government resources.
Kentucky	<p>The program has resulted in submission of better quality permit applications and regulatory information to the Division for Air Quality. This has led to a shorter review time, improving the relationship between the Division and small businesses. The information provided to small businesses by the SBAP staff has increased awareness of the Division's role in environmental regulations. It also has assisted small businesses in meeting Title V permitting requirements in a timely manner.</p> <p>Through meetings, presentations, and her monthly column, the SBO is building a good working relationship with state trade associations. The monthly column is published in 12 state trade association newsletters with a circulation of 15,000.</p>
Jefferson Cty	Some of the small businesses, especially the body shops, have begun to self-report minor non-compliance issues and solicit help prior to changes in operations.
Louisiana	We do not track this phenomena; however, replies to our evaluation requests indicate that the businesses we have assisted have a better attitude toward the environmental regulatory community.
Maine	<p>There is a definite rise in compliance among businesses we have focused on. Until the businesses are notified, many of them do not know they are subject to a rule or don't fully understand a rule. Once initial contact is made, businesses are more likely to request additional assistance.</p> <p>This year, SBTAP discovered 19 sources that were operating without the proper permits. These sources are now licensed or in the licensing process.</p>
Maryland	Small businesses have obtained necessary state environmental permits, initiated required recordkeeping under the reports and MACT rules, and have submitted required reports for MACT rules.

**TABLE G-2
(Continued)**

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Massachusetts	<p>The following information is taken from the analysis of MP2 project in which 100 random inspections of printing facilities were conducted (50 pre and 50 post program). Instead of simply categorizing facilities as being "in compliance" or "out of compliance," a list of 19 "environmental business practice indicators (EBPIs) were developed (with yes/no responses requested).</p> <p><i>Awareness of Environmental Stewardship Responsibility:</i> 1) Is educational information about environmental printing specifications available for customers? 2) Has facility tried any new P2 techniques during the last two years?</p> <p><i>Chemical Stewardship:</i> 3) Does facility track net financial cost of using hazardous chemicals? 4) Has facility switched to "greener" materials in the past two years? 5) Does facility have a hazardous waste identification number? Hazardous waste generator status: 6) Does facility keep weekly log of hazardous waste storage area inspections? 7) Does facility segregate and label hazardous wastes? 8) Does facility have clear signage over sinks and drains? 9) Does facility have clear signage regarding emergency procedures at telephones in work areas? 10) Does facility keep containers of VOC-laden materials covered? 11) Does facility recycle paper? Film? Ink? Photoprocessing chemicals? Photochemical rinsewater? Plates?</p> <p><i>Impact on the Environment:</i> (Answer yes if true.) 12) There is no evidence of an imminent environmental threat. 13) Facility does not discharge any industrial waste to a septic system.</p> <p><i>Pre-Press (Impact of Silver):</i> 14) Does facility use photoprocessing equipment? If yes, does facility have a silver recovery unit? If yes, are maintenance logs kept? Does facility meet MWRA standard of 2 ppm silver? For facility without silver recovery, do you ship photoprocessing waste off site?</p> <p><i>Press (Impact of VOCs on Air):</i> 15) Has facility calculated its VOC emissions? If yes, the annual amount is _____. Unit: _____. If heat set lithographer, estimate lbs. of ink used in 1995: _____. 16) Are shop towels stored in a closed container? 17) Has facility stopped using press wash containing chlorinated solvents? 18) Does facility use press wash product which has low VOC content, low vapor pressure or is water-miscible? 19) Is a <10% isopropyl alcohol or alcohol-free solution used?</p>
Michigan	<p>This fiscal year (1996-1997), the SBAP has begun attaching a survey to its guidance publications to measure the guidance's effectiveness with SBAP customers. SBAP also intends to measure the effectiveness of SBAP-sponsored training sessions on compliance with a follow-up survey after the scheduled event.</p>
Minnesota	<p>Many new small companies permitted for the first time. Fewer calls about emissions inventory, coming in without assistance needed to fill out inventory. People continuing to call for help, but questions becoming much more specific showing a better understanding of the rules and regulations. Better relationships between industry and government; "assistance" direction getting much praise.</p>
Mississippi	<p>There has been an increased awareness of both targeted sectors in regulatory requirements and P2 practices.</p>
Missouri	<p>We have some anecdotal information in the form of individuals thanking us for the assistance provided. Sometimes this comes in the form of a "thank you" letter written directly to us or to others in the department with whom they are dealing. Other forms have come verbally from the individuals telling us how much they appreciated our assistance. Still another form of appreciation is when they refer other businesses to us.</p> <p>We currently are working on a method to track these activities. However, we do not have our database structured to include this information at present.</p>

TABLE G-2
(Continued)

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Montana	<p>All dry cleaners in the state have complied with the MACT standard in terms of reporting requirements and pollution control equipment.</p> <p>All chromium electroplaters in the state have completed notification reports, and the one hard chrome plating business in the state is in a compliance agreement with SBO/SBAP and EPA Region VIII.</p> <p>Most of the automobile refinishing shops in the state are now aware of the required changes in coatings and are making the necessary adjustments to their businesses as a result of an SBO/SBAP sponsored workshop and repeated statewide correspondence.</p> <p>On-site consultations remain the most effective method for improving understanding and awareness of regulatory requirements. Correspondence is often ignored and workshops are not always well attended.</p>
Nebraska	<p>SBAP is continuing to provide timely and helpful information. As the business community uses the SBAP more often, more businesses request assistance. Word of mouth is working very well in Nebraska. There is a steady increase in the number of businesses that are requesting site visits.</p>
Nevada	<p>SBAP - This is a relatively new group and has not developed a method for tracking and conducting case analyses. However, we have seen an increase in the number of phone calls from industry and an increase in the number of referrals from other state and local agencies.</p>
Washoe Cty	<p>AQMD has not kept any specific tracking records of the number of citizen inquiries and permit violation in regards to each specific industry. They have made efforts in the form of information being given out to each business owner during their annual inspection. AQMD inspectors, as they inspect a facility, continually explain the regulations and procedures to the business owners and managers so that they understand what needs to be done and why. The business owners have a greater understanding and are able to deal with problems as they arise throughout the year and rectify any problems before their subsequent inspections. In addition, AQMD recently hosted a seminar for the citizens and businessmen of Washoe County in regard to the presence of asbestos, and the care and procedures needed for its abatement. Also, AQMD is interested in interacting with business and industry and have had representatives attend various professional and industrial organizations' meetings. The improvements that they have observed include a greater understanding of the regulations that businesses are required to abide by and a greater willingness to rectify any problems before a citation is necessary to be issued.</p>
Clark Cty	<p>The only area tracked is environmental improvements. "Air quality indicators" include measurements for carbon monoxide and inhalable particulate matter. Carbon monoxide levels have been dropping in the Las Vegas Valley. Inhalable particulate levels have remained roughly consistent. Both these developments may be considered remarkable in light of the Valley's long-term continuing growth.</p>
NV BAQ	<p>The goal of the compliance section is to reduce the number of violations issued each year. This goal precipitated the semiannual compliance workshops in 1989. A tracking of this goal has demonstrated moderate success.</p>
NV BEP	<p>Better understanding and awareness was achieved for various industrial sectors, with an emphasis on a seminar given to dry cleaners in December 1996. Behavioral changes and environmental improvements would be a natural result of the seminar, but have not been tracked specifically in relation to air quality assistance. BEP conducted a survey of program effectiveness in which 89% of respondents found that BEP services helped them better understand and comply with environmental regulations. The other 11% left this blank or put "not applicable." 61% implemented P2 measures as a result of BEP assistance.</p>

**TABLE G-2
(Continued)**

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
New Hampshire	Based on the substantial increase in word of mouth referrals, it appears more businesses are actively seeking assistance to see what regulations may be applicable and if they are in compliance. In addition, businesses that have contact with the SBAP are more willing to work towards compliance (and in a number of cases, exceed compliance) because they feel they are a partner in the process and not being forced to comply. The "cooperative compliance" approach seems to work much better than the "command and control" attitude of old.
New Jersey	Trade associations working with members to achieve better compliance, re. permit issues.
New Mexico	A client survey was developed in 1996, and two of the questions address this. The questions on the survey are: 1) Do you now have a greater interest in improving the environment? 2) Are you now more aware of environmental laws? All 13 respondents answered "yes" to these questions.
New York	Many previously unpermitted businesses in NYS now have permits as a result of SBTCP outreach and compliance assistance. The majority of callers to the SBAP hotline are seeking regulatory information with regulations, provided they know of their existence and can understand what they must do to comply. It also reinforces the need for SBTCP, since small businesses are unable to obtain the information and assistance they need from elsewhere. There is a direct correlation between outreach efforts and the number of businesses that call SBTCP for assistance. With increased outreach, which has already begun in 1997, the number of businesses calling SBTCP and DEC to achieve compliance also has increased.
North Carolina	Improvements have resulted from small businesses learning what is required and how to complete forms. The confidential policy of this office has encouraged business to ask if they need a permit or what requirements apply. As the businesses find out what is expected of them, their compliance increases. Recordkeeping is still a great burden for small business. Simplifying the requirements improves compliance.
North Dakota	It is difficult to assess the environmental improvement or compliance improvement that may have resulted from the assistance the SBAP or SBO provided. However, any assistance provided surely made it easier for business to comply. With regard to dry cleaners, the state has a 95% success rate in receiving the compliance reports from regulated sources. This success rate can be directly attributed to the SBAP.
Ohio	<p>Printing Industry of Ohio (PIO) reports a major buyer of printed material in Ohio now is requiring suppliers to follow PIO's ENVIROPRINT manual for continued business.</p> <p>Those who have received on-site assistance expressed sincere appreciation for our efforts and report feeling more at ease when dealing with OEPA. This has been demonstrated through additional calls to SBAP referred contacts and from several trade organizations voluntarily promoting SBAP and SBO services.</p>
Oklahoma	We have not really tracked such issues, but we believe that the culture is changing within our own Agency to address increasing environmental compliance through more common sense approaches to environmental regulation.

**TABLE G-2
(Continued)**

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Oregon	There is a growing awareness of cost associated with unpermitted pollutant discharges, hazardous waste disposal, and liabilities resulting from accidental releases in many small business sectors. During this reporting period, eleven dry cleaners have either installed new dry-to-dry or aqueous cleaning machines and are eligible for P2 tax rebates. One dry cleaner replaced a perchloroethylene transfer machine with a new high flash point petroleum cleaning solvent machine, reducing perc usage by approximately 750 gallons per year. An electronic equipment manufacturer and wholesale fixture business installed aqueous cleaning machines. Conversion to aqueous cleaning enabled these companies to avoid Title V air permits and Toxic Release Inventory reporting. Powder coating technologies are becoming more popular to comply with MACT, GACT, and worker safety regulations. There was a 32% increase in general technical requests in 1996.
Pennsylvania	N/R
Puerto Rico	Even though businesses still don't like dealing with environmental matters, once they get to know our main purpose, they usually keep in touch with us for an update on requirements and suggestions. Very important is the fact that the businesses feel more at ease if they are treated very nicely.
Rhode Island	Overall outreach, communication, and availability of SBO and technical assistance outreach services continue to have a positive impact on behavior and environmental compliance.
South Carolina	Reduced fear of small businesses in asking questions on regulatory requirements and compliance issues. This leads to increased compliance and identification of sources.
South Dakota	The department's technical assistance activities have helped small businesses understand and comply with the new federal requirements.
Tennessee	Program assistance has resulted in 75% regulatory response compliance rate for new MACT standard impacted companies. Program evaluations indicate that workshop participants gained a greater understanding of the regulations. Businesses have expressed interest in ensuring compliance in all areas of their business that may impact the environment.
Texas	<p>Wood Products Industry: In 1996, 1,780 businesses in the wood products industry were contacted by SBAP as part of an industry-specific outreach to promote compliance. These outreach efforts allow enforcement divisions of the agency to focus their resources on other industries maximizing environmental protection. As a result of this outreach, the number of wood products manufacturers calling on the hotline for assistance rose from less than 50 in 1995 to 388 in 1996.</p> <p>There was a 73% increase in the proper handling of non-hazardous waste, a 1% increase in conducting hazardous waste determinations, a 43% increase in waste related recordkeeping, a 77% increase in transporting of hazardous wastes off site within required time limits, and a 52% increase in disposal of hazardous waste at an approved facility.</p> <p>Auto Body Industry: During a 14 month period beginning in 1995, SBAP conducted site visits for the auto body industry. The average initial compliance rate was 72%. After initial assessments, SBAP made follow up visits to measure compliance. The average compliance rate had improved to 88%. In addition, SBAP site visits saved each auto body shop an average of \$1,200 through reduced costs for materials, consulting fees, and avoided penalties.</p>

TABLE G-2
(Continued)

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Utah	<p>Participation in Industry Workshops/Seminars: SBAP presented information on air quality issues, regulations, and SBAP services at various industry workshops, seminars, and meetings. As a result of this outreach effort, we have received requests for assistance from industry attendees after the outreach activity. These assistance requests varied considerably, from MACT compliance assistance to permitting assistance. During the early years of SBAP, considerable staff time was devoted to the development of environmental conferences and workshops. The majority of these workshops and conferences were poorly attended. During this reporting period, SBAP focused on identifying other in-roads for reaching small businesses.</p> <p>On-site Assistance: Small businesses are generally more receptive to on-site visits when it is recommended by a peer. A special targeted industry campaign with the printing industry during fall 1995 has continued to encourage industry requests and inquiries statewide. On-site visits appear to be valuable in providing information in a comfortable setting and therefore, education seems to be longer lasting.</p>
Vermont	N/A
Virginia	<p>There is a strong relationship of compliance assistance activity to the awareness and acceptance by the existing regulated or newly regulated community. We saw with the dry cleaners in 1994 that their acceptance of responsibility to comply with regulations was a direct result of their understanding of the requirements, the costs of compliance, the benefits of compliance, and that there was a willing party (SBAP) to provide information and assistance outside a perceived hostile environment. As indicated in last year's report, the initial results of the June 18, 1994 deadline for initial notification reports was met by 73% of Virginia dry cleaners. Continued cooperation between the state and interested trade associations ensured continuing wide coverage of compliance assistance activities, consistency of information, and follow up. As reported last year, SBAP provided 7 initial compliance workshops, which followed in September 1996 with another 6 final compliance workshops. Notification report compliance in Virginia reached approximated 84% in October 1996.</p> <p>We are finding that a large part of the success of any outreach assistance is a continued interest in and delivery of a non-regulatory assistance message to the affected source population. This includes concise understandable materials, a recognition of the minimal available time for a source to participate in outside activities beyond his daily business, and the provision of options for compliance. All these are critical to the success of a compliance assistance effort. Results of compliance assistance activity will not necessarily yield verifiable results immediately. Compliance assistance activity should be viewed as a system, a support system, that will yield incremental results arriving at full compliance.</p>
Virgin Islands	N/R
Washington Ecology	Improved compliance across all media by dry cleaners and improved cooperation between Ecology and the state dry cleaners trade association.
BCCAA	Dry cleaners will call us before they operate a new perc dry cleaning machine. Rock crushing plants call us to get a permit before they start a new job.
OAPCA	Better understanding of the agency's mission by the regulated community and how the agency can provide technical assistance through SBAP. More industries and sources willing to call the agency for assistance instead of avoiding contact with the agency until detected or complaints lead the agency to the source. Less frequent pleas of ignorance on the part of the sources.

TABLE G-2
(Continued)

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
SCAPCA	Use of lower pollutant emitting materials, specifically lower VOC content and toxicity (e.g., converting from MEK to a less toxic solvent). Increased use of SCAPCA personnel as a resource for business assistance information rather than as an enforcer.
SWAPCA	In general, our customers want to comply with as minimal an effort as possible. Our assistance expedites that compliance and allows them to get back to their primary business activity. Our program also works with the agency to improve maintenance plan compliance and to develop other customer friendly outreach programs and projects to assist the regulated community, including dry cleaners and paint distributors this year.
YRCCA	Better understanding of why regulations are needed. Improved attitude from sources toward the agency. Less reluctance to ask the agency questions. More cooperative approach with respect to incorporating changes. Willingness to apprise when compliance by others is not being met.
West Virginia	<p>Improved awareness by small businesses results from almost every contact (i.e., phone, brochure, on-site audit, etc.). Also teleconferences, training, and all outreach activities result in improved awareness of the environmental responsibility by small businesses. For example, all dry cleaners in WV have been contacted at least once and many three times. All are aware of the changes in operation and equipment required, and the majority are now in compliance.</p> <p>Chrome plating facilities subject to MACT standards have reached a high rate of awareness due to outreach and workshops from the SBAP. Follow up calls/visits indicate that the program has been effective in educating and encouraging platers to comply with the new standard.</p>

**TABLE G-2
(Continued)**

PROGRAM	IMPROVEMENTS IN REGULATORY UNDERSTANDING AND COMPLIANCE
Wisconsin	<p>In 1996, we saw an increase in the number of calls for assistance. Small businesses are better informed by our program because our efforts are reaching them and our materials and presentations are clear and understandable. Some of our clients have made changes to their facilities based on guidance provided by our program. When we asked our clients if they had been able to reduce their air emissions as the result of the assistance provided by the SBCAAP, we received the following comments.</p> <p>"We have invested in the latest type of equipment to comply with all controls." Burlington Cleaners "We now use HVLP spray equipment to reduce overspray and use low VOC products." Osseo Ford Sales & Service "Now we cover our plating baths when not in use." Badger Labs "I purchased a new dry to dry cleaning machine." Donaldson's One-Hour Cleaner "We now do a better job of monitoring during hours of operation, run limits operations on some days, and encourage carpooling and public transportation." Kitizinger Cooperage Corporation</p> <p>Due to our outreach efforts, 87 out of the 130 rock crushers not in compliance due to not submitting a general operating permit application came into compliance or notified the DNR that they are not affected by permitting requirements. As a result of our dry cleaning outreach and workshops, 12 out of 21 facilities with old transfer machines or ineffective dry to dry machines upgraded their equipment.</p> <p>The level of knowledge and understanding by our business clients appear to be increasing. We anticipate further success and we continue to target and penetrate unreached business sectors. In a recent survey of our customers, 82% felt their understanding of air regulations increased because of our program and they would recommend our services to others. 46% of our customers have been able to reduce their air emissions as the result of receiving assistance from SBAP.</p>
Wyoming	<p>Measurable improvements in compliance are very difficult to determine without a MACT standard small business inspection and compliance program. Intuitively, over the last year, small businesses have shown a slight increase in discussing problems with SBAP. The trust necessary for improving this communication link needs to be expanded greatly to increase the effectiveness of assisting small businesses with compliance issues.</p>

N/A Not applicable
 N/R No response

**TABLE G-3
RECOMMENDATIONS FOR CHANGES TO ASSIST SMALL BUSINESSES IN COMPLYING WITH THE CAA**

PROGRAM	RECOMMENDATION
Institute Multimedia Pollution Control Efforts	
Arizona	Consolidate all reporting requirements from all environmental programs for each industry. Regulate facility by industry sector, not by media (one stop shopping for all environmental government concerns). Stop revising individual Acts (i.e., CAA, CWA, SDWA, etc.) and regulate businesses by industry sector.
Placer Cty, CA	Separate air and waste issues in the minds of the small business. Explain graphically why small businesses need to have permits and pay \$400-500 for the permit when they will not be doing anything different before and after permitting. Allow "streamlining" where appropriate, possibly combining air and waste issues in one operating permit, one annual inspection, etc.
SCAQMD, CA	Coordinate regulations so that they are prioritized nationally and allow a set of air, water, solid and hazardous waste regulations (that impact one industry) to be issued within the same time frame.
Iowa	SBO response: Federal legislation needs to be passed that will broaden the role of the SBO to encompass all forms of pollution.
Massachusetts	Make all compliance assistance programs multimedia by definition. Creation of the artificial (single media) distinction doesn't work well for small businesses and doesn't improve implementation for the agency.
Minnesota	EPA needs to start thinking more in terms of multimedia/P2 sector and/or process rules and regulations.
New Hampshire	Continue efforts to have SBAPs fully multimedia.
North Carolina	Continue the effort to make environmental information and assistance multimedia. Small businesses expect environmental assistance to help with all regulations affecting them. They find it difficult to understand why they need to deal with 4 or 5 different agencies.
North Dakota	Allow SBTCPs to use their funding in multimedia pollution control assistance and not restrict use of funding to solely air pollution control assistance.
South Carolina	Make outreach and assistance by SBAPs multimedia.
Utah	Multimedia Support and Coordination: Many small businesses that seek SBTCP assistance request cross-media support and assistance. SBAP receives numerous requests from small businesses to establish a "one stop" regulatory assistance center.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
Virginia	Expansion of programs into multimedia with appropriate funding provided by EPA for other media (water/waste).
West Virginia	SBO's duties should also be expanded to include all DEP Offices (multimedia) and that adequate staffing be provided.
Wisconsin	SBTCPs should have multimedia authority, not just for the CAA, but for CWA, RCRA, and CERCLA as well.
Wyoming	The CAP believes that the SBAP will be more effective in the multimedia arena and not limited to air quality only.
Increase / Ensure Adequate Funding for All Small Business Assistance Programs	
Alaska	More federal money to support state SBTCPs. Also, more federal funds or grants for small businesses to be able to hire consultants for complicated issues and for equipment upgrades required by MACTs.
Arizona	Mandate with appropriate funding true multimedia compliance assistance programs.
Colorado	Provide more financial and information resources to SBO/SBAPs.
Indiana	Increased funding/continued adequate funding. As the word spreads through the regulated community, CTAP has received more and more requests for compliance assistance. There are a number of projects that CTAP could be taking on if we had additional personnel.
Iowa	Ensure adequate funding for SBAPs. Support efforts by SBAPs to expand and improve the technical assistance they provide. Eliminate national compliance assistance centers and funnel the funding to state programs.
Michigan	Provide more money to state SBTCPs to develop and utilize innovative ways for distribution of environmental program content and services to various industry sectors; a type of "back door" approach to outreach and education for the small business workforce. For example, a federal or state grant would allow an SBTCP to work with federal and state government as well as business, industry, and statewide educational institutions to coordinate and package environmental compliance and pollution prevention information that is specific to industry sectors. The information would be introduced to students at the secondary or post-secondary level so that by the time the student enters the workforce, he/she will bring timely, relevant and useful knowledge/experience to specific industry or business.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
Montana	Redirect compliance assistance center resources to EPA regions to provide direct, hands-on training to SBO/SBAP personnel. The training should be held in actual small business locations so personnel can learn first hand the processes they're trying to improve. Redirect same resources to the state SBO/SBAPs to enable them to provide more on-site assistance.
New Hampshire	Maintain and expand core funding for SBAP activities. Competitive grants should be drastically reduced or eliminated. The SBAPs work extremely well together and share material, research and expertise without wasting time chasing funding. EPA needs to give us the authority, responsibility, and trust to fulfill our obligations under the CAAA with proper funding.
New Jersey	EPA should provide funding to states when needed. EPA should set up regional meetings, conferences, etc. to help states that have travel problems.
Ohio	US EPA needs to devote more resources to US Small Business Ombudsman program and other mechanisms to support state level efforts.
Oregon	The greatest obstacle to meeting all the regulatory requirements of the CAA is the lack of resources. Many SBAPs are functioning at 1 FTE. Training, financial, and support assistance are in great demand.
Tennessee	Federal financial support for each state to attend national meetings would go a long way to ensure attendance during budget crunch times.
Virgin Islands	More training for coordinator and staff.
Wyoming	Adequate funding and resources need to be allocated to establish a multimedia SBAP that can provide a broader technical and compliance assistance program.
Utilize the Internet and Other Electronic Resources for Information Exchange	
Arizona	Make all environmental reporting and recordkeeping electronic with one environmental form due annually. Then let the multitude of agencies all have access to the information and pull from it what they need, rather than businesses having to send ten different forms to eight different governmental agencies. This includes the multitude of emergency response plan requirements that currently exist.
California	Provide free downlink locations for participating in training.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
Montana	Stop giving money to UTC to produce video teleconferences that are 3 hours long and consist of talking regulators. Montana's small business owners have neither the time nor the interest to participate in lengthy teleconferences in the middle of their days. Moreover, they have no interest in listening to bureaucrats talk about the regulations. Instead, make short (1/2 hour) videos on compliance with actual case studies for distribution by SBO/SBAPs.
Nevada	Better dissemination of information, maybe electronic in form, would be helpful. There should be a program where the specific goal of disseminating information should be to augment the services of the providers of information, be it SBAP, SBDC, or regulatory agencies.
Oregon	Training - Offer 1 to 2 hour teleconferences on all upcoming NESHAPs affecting small businesses. Develop 30 minute training videos with workbooks for small business sectors. Offer teleconferences on cross-media P2 and environmental auditing. Offer a national training teleconference for environmental consultants serving small businesses.
Rhode Island	Utilize electronic media wherever possible. MACT teleconferences are valuable and should continue.
Expand National Advertising to Increase Program Exposure	
Alaska	In general, need more white hat help on both the state and federal level to locate and educate the small businesses on what is required of them.
Maricopa Cty, AZ	I would think we need a national PSA campaign highlighting why business needs to comply and how SBAP can help them.
Illinois	Increase outreach to let businesses know we exist.
Iowa	EPA needs to expand its national media efforts/campaign.
Jeff. Cty, KY	Very small business owners do not see themselves as part of the "regulated community." They see themselves as "citizenry" who are self-employed or who own a small shop. They may not take the time to be involved in a trade association or read industry trade journals. Therefore, the best way to reach them to inform them of their obligations regarding air pollution is to reach them as citizens. The CAA regulations and standards need to be more visible to the common man and given a higher profile. Use TV ads, billboards, radio spots, etc. to raise the consciousness of air pollution and what it means to the ordinary man.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
New Hampshire	Ensure SBAPs are the primary contact for environmental compliance and assistance. There is no substitute for the professional knowledge possessed by the SBAPs for environmental issues.
South Carolina	Publicize available assistance on national level.
Utah	Publicity: National Public Service Announcements and a toll-free national hotline would be beneficial in promoting SBAP/SBO services. Small businesses could then be referred to states for local support and technical assistance.
Provide / Facilitate Acquisition of Generic Outreach and Training Materials	
New York	Formalize technical and compliance information outreach to environmental consultants. One third of calls to SBAP hotline come from attorneys/consultants; 18% for SBO. Frequently, the consultant has already called the state regulatory agency for information and was referred to SBAP. Providing information to consultants eventually helps the small businesses, but it is not part of SBTCP's mandate and can take time away from direct contact between SBAP and small businesses. All states should be required to implement a program to train consultants to keep them informed of regulatory changes. If informing consultants is to be a part of SBTCP's responsibilities, let that responsibility be formalized and defined so that SBTCPs can take a proactive approach in providing outreach to consultants.
Ohio	The US EPA-developed brochures for the chrome plating and solvent degreasing MACT standards have been helpful.
Pennsylvania	Improved outreach for awareness of new regulations such as the MACT for degreasers. I don't know how.
Rhode Island	All federal materials should include one-page, simple-to-read factsheets.
Utah	Environmental Assessment Training Opportunities: Industry-specific training sessions that provide a step-by-step approach to conducting on-site environmental assessments, including P2 assessments, would be of great benefit to SBAP staff.
Washington	BCCAA: Train regular state and local inspectors to provide technical assistance. Let them wear both the hats of compliance and technical assistance. Reduce federal and state level SBAPs to coordinate functions.

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATION
Establish Mechanisms to Finance Environmental Compliance Equipment	
Arkansas	Grants/loans made more available to pick up where compliance issues drop off.
SCAQMD, CA	Provide tax or other incentives for manufacturers of coatings and resins to develop new products that exceed most stringent current regulations. Small businesses in CA, for example, depend on formulations and chemistry developed elsewhere. We have stringent regulations, yet represent a small part of the total market.
Michigan	Provide grants or low interest loans (under the administration of SBTCPs only) for small- and medium-sized businesses for access to design engineers for modification of current facility processes and control equipment to reduce air emissions.
Minnesota	Need more incentives for small businesses to make costly improvements including financial assistance programs, tax exemptions, etc.
Montana	Make more resources available for small business finance programs and research projects on new equipment.
New York	Improve small business' access to funding to purchase equipment necessary to achieve compliance. Presently, small businesses have difficulty obtaining financing for environmental compliance projects and appear to be unable to obtain loans from the Small Business Administration (SBA) if they are out of compliance with regulations. Government support could include capitalizing state or federal revolving loan programs, establishing matching grant programs, or enhancing SBA's ability to provide grants/loans to small businesses in order to come into compliance. Small businesses who cannot purchase equipment with their own, usually limited, funds and who are unable to obtain loans/grants will either continue to operate out of compliance with CAA, shut down, or relocate.
Oregon	Financial - Develop a national policy that allows small businesses to invest in P2 technologies in lieu of air permits. Institute a revolving fund to finance small business technology conversions. Fund small business R&D projects with emphasis on P2. Increase grant funding to SBAPs.
South Carolina	Federal financing available by revolving loan or grant program for compliance requirements.
Texas	Work with lending institutions to provide funds for environmental compliance. Use good science and realistic facts as the basis for regulations and share copies of studies. Focus on results (i.e., improved environment), not equipment.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
Utah	Financial Assistance for Compliance: Although the establishment of SBTCPs provides technical support to small businesses, many small businesses continue to lack the financial resources for pollution control equipment to P2 methods. The creation of financial compliance assistance, such as low interest revolving loan programs, would greatly enhance CAA compliance and SBTCP services.
Virginia	Provision of revolving loan fund seed money by SBA for small business compliance activities.
Washington	SWAPCA: Pollution control financing assistance and off-the-shelf control technology solutions for common business scenarios.
West Virginia	The proposed state "Revolving Low Interest Small Business Environmental Loan Program" should be given priority. The costs of compliance and/or the costs of pollution prevention are disproportional for small businesses, because the majority of the emission requirements are not related to an economy of control scale. It is recommended that new regulations be drafted or redrafted where necessary, to truly consider the compliance problems faced by small businesses, taking into consideration realistic and practical environmental requirements. Also, for each regulation, practical <i>de minimis</i> levels should be established, below which, permits would not be required. Despite the Section 507 enforcement policy, SBREFA, et al., typical EPA enforcement actions for dry cleaning violations seems to be about \$10,000. This is excessive considering the capital cost of a common dry-to-dry machine at about \$50,000.
Expand / Facilitate Effective Communication Between State and Federal Agencies	
California	Compile a user-friendly report that contains the best state programs among the 50 states and support adaptation of appropriate aspects by states.
Colorado	Encourage better communication between EPA and state and local programs.
Florida	Expand and experiment with various outreach activities. Create a two-way network with state field inspectors who are doing compliance assistance activities. Information gathered by field inspectors can provide a measure on the effectiveness of the outreach, forecast deficiencies and help in planning future activities.
Iowa	Expand communication between state and federal agencies to address environmental issues from a small business perspective. Facilitate/encourage networking of assistance providers (e.g., ensure involvement of SBAPs in the Small Business Regulatory Assistance Act under consideration in Congress).

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
Minnesota	As the MPCA and SBAP work to create innovative programs with positive environmental outcomes, need EPA to be more flexible in allowing these to happen.
Nevada	SBAP - There needs to be a better organization of federal information. The amount of paperwork coming into the office is overwhelming.
New Hampshire	EPA (through federal and regional SBOs) needs to continue to provide a coordinating role for increased communications. EPA Region I has been very helpful in interstate communications, which has been an asset in avoiding duplication of effort.
New Jersey	EPA should pass information (i.e., MACT standards) much faster to states.
Oregon	SBAP Support Policies - Develop an easy-to-use national technical assistance tracking and reporting database. Develop a national small business mentoring program. Develop a national cross-media P2 green sticker recognition program. Develop a simple version of ISO 14000 for small business.
South Dakota	EPA should step up their efforts in helping states identify sources or categories of sources that will be affected by maximum achievable control technology standards.
Tennessee	Greater support and involvement at EPA regional offices are needed for program activities.
Washington	Ecology: Stop writing guidance from the federal level that is intended for sources. Federal regulations usually are substantially rewritten before implementation at state and local levels. The federal outreach materials serve only to confuse the sources. Instead, provide substantive outreach to the state and local agencies, allowing them to design outreach materials that best fit the needs of the sources directly under their jurisdiction.
Washington	OAPCA: Informed County and City Agencies: Often times a small business obtains all the necessary building permits and receives an MDNS or DNS without even contacting the local air authority. Local building departments need to recognize that rock crushers, spray booths, boat yards, and other types of new small businesses may need approval by the local air authority prior to starting construction. OAPCA has an outreach program for educating local building, planning, and environmental departments, which has greatly improved the situation in OAPCA's jurisdiction. It appears there may be a need for more work in this area.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
Allow Flexibility in Rules Applying to Small Business	
Alabama	Finalize and adopt the interim transition policy that excludes industries whose actual emissions are less than 50% of major source thresholds from obtaining unnecessary synthetic minor operating permits. Experience in Alabama has shown that as many as 75% of specific categories of industries would be able to avoid the permitting process and that their existing records can demonstrate compliance with being classified as a minor source.
Alaska	<p>Need to eliminate any type of rolling totals or averages. If tracking is required, should be based on calendar month or calendar year.</p> <p>On a state level, the hourly fee that is charged to permitted facilities will cost small businesses more than if they were to pay solely an emission fee as EPA would do if they ran the program. On the state level, need to have a set fee or flat emission fee for small businesses so that they know what the cost will be.</p> <p>On a state and federal level, need to have some type of incentive to reduce emissions. The federal rule of "once in, always in" is almost a disincentive to reduce emissions. The rules should allow businesses to reduce emissions and thus reduce regulatory requirements.</p> <p>Need to allow for exemptions from SIP requirements, certain NSPS requirements, and MACT requirements. An example is an opacity standard, which is very expensive for a small business to install opacity monitors or become a certified Method 9 visual reader. Should allow small businesses to be exempt or have a very easy way to determine compliance as is required by Title V. For opacity, it could be if the stack is "smoking" heavily or not.</p>
Arkansas	Instead of creating more regulations, concentrate on solutions for existing regulations.
California	Explore ways under Title V implementation to minimize burdens on small businesses.
Placer Cty, CA	Recommend simplifying regulations and making them conform nationwide for industries such as dry cleaners, auto refinishers, etc.
SCAQMD, CA	Reduce recordkeeping requirements -- use purchase records or purchase and inventory records for small sources.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
Connecticut	Simplify and Consolidate Federal Requirements: The complexity of some of the federal MACT standards and CTGs will prove to be incomprehensible to most small businesses. In this area in particular, there are so many requirements that apply on top of other existing federal and state requirements, it will be virtually impossible for small businesses to comply with all of them.
Delaware	<p>Somehow, regulators who write regulations MUST become more aware of the ability of those being regulated to grasp the intent and purpose of regulations. Those being regulated need to have environmental regulations, at both the federal and state level, written in a manner that are easily interpreted and understood. They need to know that when they take time away from their business to do what is necessary to be in compliance, the time they spend will not end in frustration from trying to get at the WHO, WHAT, WHERE, and WHY of environmental regulatory compliance. Compliance is required by law; however, that should not mean that regulators are not in tune with how to make compliance as simple as possible. Just because it is the law should not mean that regulators and agencies fail to "market" environmental regulatory compliance and relate compliance as a benefit to be derived by large and small businesses alike. The IRS, EPA, and DNREC are all held in the same regard among the vast majority of businesses because of a lack of common sense and practical methods of environmental regulatory compliance.</p> <p>Re-think how and why we regulate small sources. If the actions required and the dollars invested by a small business in order to be in compliance cannot be directly linked to improvements in the air, water, or land, then do not ask them to spend the time or money. Make regulatory compliance meaningful, especially to small businesses. The large majority of businesses I come into contact with want to do the right thing when it comes to the environment, but when compliance amounts to nothing more than filling out another pile of meaningless paperwork, cooperation from small businesses is justifiably hard to come by.</p>
Indiana	Flexibility in applying regulations to small businesses.
Kentucky	Federal program stability. Procedures that allow states flexibility to use non-traditional methods of bringing small businesses into compliance. Recognition that concepts like "potential to emit" may require modification when applied to categories of small businesses. Awareness that a detailed paperwork system to prove that a permit is not necessary is inefficient.
Louisiana	Find a simpler, more understandable method of regulating small businesses. We have essentially downscaled regulations for major sources and applied them to small businesses. It is cumbersome, complicated, and ineffective. We should take a whole new look at how we regulate small business.

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATION
Maryland	Change MACT standards to make recordkeeping easier and eliminate most reporting requirements.
Minnesota	Need to realize that "one size fits all" rules do not work well – small businesses operate under very different circumstances than large businesses – need to really look at more size exemptions and "insignificant activities." More outreach and education to sectors can and do get more environmental benefits than complex rules and permitting.
NV BEP	It would make more business sense to use the SBDC in each state more efficiently so that information provided to businesses could be perceived by that business as being confidential. During regulation development, it would be good to make information that is more "business friendly" available to SBDC and SBAP. This would help in reaching more affected businesses and create an avenue for dialogue between regulators and businesses.
North Carolina	<p>Continue to work on changing the definition of "potential to emit" to reflect a reasonable estimate of "actual potential emissions."</p> <p>Modify EPA enforcement policy ("once in, always in") to allow major sources to voluntarily reduce emissions below major thresholds to become small "non-major" sources. Simplify requirements and reduce the paperwork. It is still difficult for a small business to be certain all applicable record requirements are met.</p>
North Dakota	Allow states flexibility in administering rules and policy they adopt that are intended to assist small business (e.g., different versions of amnesty that result in compliance).
Ohio	More MACT standards need to include small business applicability or exemption criteria. For example, the wood finishing MACT included "exemption levels," which were based on material usages, not emissions. This approach is much easier for both companies and regulators to understand and work with. Many times, SBAPs focus on how small businesses can avoid permitting and reporting requirements (i.e., CDSQGs, FESOPs, permit-by-rule exemptions) and some SBAPs have taken the lead to develop new exemptions for their state. These kinds of efforts must be supported by US EPA. It is usually difficult for states to get these types of exemptions approved in a SIP.
Oklahoma	Continue to allow states an increasing amount of flexibility to design and implement their own minor source permitting program. This helps us as we continually seek ways to help the small business community through the design of comprehensive and philosophically sound approaches to air quality regulation.
Oregon	Regulatory - Reward P2 by abolishing the "once in, always in" policy. Adopt realistic potential to emit criteria for small businesses.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
South Carolina	Increase standard exemptions for small sources. Redefine potential to emit for small sources to actual emissions.
Utah	Exemption from Title V Permitting Requirements for Area Sources: Upcoming Title V permitting requirements will create an additional layer of paperwork requirements for area sources without significant environmental benefits. Any necessary monitoring, emission standards, and recordkeeping requirements can be administered effectively through state New Source Review programs. At this time, areas have been temporarily deferred from the permitting requirements.
Washington	OAPCA: New Source Review (NSR) Reform: Many small businesses are still large enough to be classified as "minor sources." New minor sources are subject to minor new source review under WAC 173-00-110 and are required to obtain approval of a Notice of Construction application prior to commencing construction of the facility. This presents a problem for new small businesses since the state new source review requirements under WAC 173-00 are so complicated. I believe that Ecology's current efforts to "reform" Washington's NSR regulations will go a long way toward helping small businesses. In particular, we believe the following NSR changes would simplify minor NSR and shorten the time for a small business to gain NOC approval: 1) Clear exemption thresholds defined in the regulations for determining which sources are exempt from having to go through the NOC process. 2) Predetermined BACT for certain source categories or a state BACT clearinghouse for area sources to take the mystery out of BACT in the permitting process. 3) Statewide uniform Approval Orders and O&M plans for certain area sources.
West Virginia	Small businesses need increased assistance in the "permit process" and/or the permit process for small businesses needs to be greatly simplified. SBAP should be expanded to provide assistance to more small businesses, to include placing SBAP representatives in the regional offices in the state of WV. In addition simple yet enforceable, "General Best Management Practice Agreements" should be explored for small sources in lieu of complicated permits where possible.
Wisconsin	Eliminate motor vehicle refinishing RACT pre-cleaning and equipment requirements upon implementation of national rule in 1997.
Avoid Duplication of Effort in Compliance Assistance Activities	
Connecticut	Coordination of Technical Assistance Providers: The coordination of technical assistance should be a priority on the federal level. Isolated grants through EPA, SBA, NIST, and DOC have resulted in the proliferation of state technical assistance providers. In some cases, this has increased confusion for small businesses and has led to redundant functions for TAPs.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
District of Columbia	To use trade associations for information dissemination. The small businesses trust their associations more than they trust government representatives.
Georgia	We would eliminate the duplication of services assigned to the various agencies to assist small businesses with environmental issues.
Illinois	Continue to develop partnerships with other small business assistance providers.
North Dakota	Ensure that the proposed federal compliance assistance centers do not duplicate the efforts of the state SBTCPs, which would be a waste of tax payer money. If the centers are established, one role of the centers that may be helpful to the states would be to serve as a clearinghouse for documents. Any federal compliance assistance centers established need to keep the state SBTCPs informed of their capabilities and materials upon which SBTCPs can capitalize. Small businesses are more likely to request state and local assistance before federal assistance.
Wisconsin	Ensure that federal programs do not duplicate efforts at state level.
Promote Compliance Assistance Versus Enforcement	
Maricopa Cty, AZ	A federal program could be created that offers small businesses an opportunity to fill out an EPA Compliance Incentive Form. Businesses can use the EPA Compliance Voucher for a limited specified time as a resource for compliance incentive. This should increase the level of trust between EPA, state environmental departments, and small businesses.
Connecticut	Enforcement: States and small businesses need support in the area of compliance assurance and measuring compliance. EPA Regional Offices (Enforcement and the Regional Counsels) need to look broadly at compliance measures and avoid narrowly defined measures to evaluate state enforcement programs. State SBAPs have implemented many innovative programs that have enhanced compliance. Measures should be based on a variety of indicators that are much broader than number of referrals, amount of penalty, etc. These measures could include emission reductions, permit requirements avoided, and P2 measures implemented.
Illinois	Continue to focus on compliance assistance instead of enforcement.
Iowa	Compliance assistance centers have the potential to become an important resource tool to SBAPs. Resource would be better utilized by funding/strengthening existing centers instead of establishing new ones.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
Massachusetts	Demonstration of good faith. Currently, listing a facility as being "in compliance" or "out of compliance" is not as indicative of environmental protection as one might think. We should establish a multimedia set of "weighted" <i>Environmental Business Practice Indicators</i> for small business that actually reflect the most important environmental protection issues. A facility that demonstrated compliance with the weighted indicators (<i>let's call them the 10 Commandments of Environmental Business Practice</i>) would be making a "good faith" demonstration of attempt to comply with all laws. This would be implemented in conjunction with OECA's Compliance Incentive schemes, but replace the much more cumbersome criteria they apply for a business to be granted a penalty waiver for less serious issues of non-compliance.
Minnesota	EPA must support SBAP and other programs that wish to get people in the system and do the right thing from that day forward and not punish them for past history of administrative violations (i.e., enforcement waiver for wood finishing initiative).
New Hampshire	EPA needs to keep a good balance between compliance assistance and enforcement with assistance efforts offered first. Enforcement should be utilized only after assistance is rebuked or the violation is willful, knowing, and serious.
Ohio	US EPA needs to continue to improve coordination with state programs in the development, announcement, and implementation of new assistance initiatives. There is a very clear impression in the small business community that US EPA is backing away from any commitment to emphasizing the "carrot" rather than the "stick," and accordingly, business has a renewed interest in staying invisible and not worrying about compliance until caught. This view is based on the realistic opinion that most small businesses will never see an inspector.
Puerto Rico	Keep on working with the enforcement people and the people who make the laws so that compliance will be more effective and reasonable for small businesses.
Develop Plain Language Materials	
Pima Cty, AZ	More information in the regulations up front about why there are 189 HAPs and 6 NAAQS pollutants. Information on health effects and impact on local economies would bring regulations into perspective for the regulated community.
Arkansas	Publish regulations that are easy to understand.
Illinois	More understandable information (plain english guides).

TABLE G-3
(Continued)

PROGRAM	RECOMMENDATION
Texas	Write Federal Register notices in plain language. Develop short summary brochures for complicated regulations (i.e., chrome NESHAP brochure). Find and agree on one term to describe something rather than using two or three. Notify businesses about applicable rules through other sources in addition to the Federal Register.
Virginia	Continue emphasis and increase activity on the part of EPA in reaching full program integration with all rulemakings. Lay understandability should be an indispensable hallmark of all regulations prior to promulgation.
Washington	OAPCA: Try to write regulations in a way so everybody can read them and understand them. Currently, it is often hard to understand exactly what businesses need to do to be in compliance. Provide workshops and telecourses, etc. to train state and local agency personnel on new regulations that will affect the small business community.
Washington	SCAPCA: Clarify regulations. Reformat regulations to be more user-friendly. More descriptive fact sheets. More industry-specific manuals; the Ecology dry cleaner manual is a success story. More information on health effects of air pollutants. Resource lists. Multimedia inspections. Multimedia seminars.
Other	
Alaska	Allow small population states to reduce the size of CAP. Or, allow states with very small SBTCPs (1 or 2 people total) to reduce the size of the CAP.
Maricopa Cty, AZ	A "Determination of Applicability" program would be very helpful that can answer both whether a business needs an Air Quality Permit and, if so, to what regulatory agency they should apply. If a business is required to have a permit under a federal law that is administered by a state and then delegated to a local government, the business owner is legitimately confused. As a result, the timeliness for an application to the proper regulatory agency for an Air Quality Permit is hampered despite a small business owner's willingness to be compliant.
Placer Cty, CA	For landfill gas and soil remediation projects, meeting emission requirements, estimating emissions for application, and performing screening risk assessment if required.
SCAQMD, CA	Regulate federal sources -- this will help small businesses see that they are not being asked to do the whole job.
Colorado	Allow state SBO/SBAPs to operate with unconditional confidentiality in regard to discovered violations with an exception such as when imminent endangerment to public health or the environment.
Iowa	SBO needs to be included in the implementation efforts of the Small Business Regulatory Fairness Act.

**TABLE G-3
(Continued)**

PROGRAM	RECOMMENDATION
Maine	Include incentives for pollution prevention in all new rules.
New Hampshire	EPA should minimize direct outreach efforts to small businesses. The vast majority of small businesses I deal with do not trust EPA, but they do have a higher trust level for the state programs and agencies.
Pennsylvania	Strong enforcement presence so that small businesses seek assistance instead of remaining hidden or unknown.
Virginia	More comprehensive economic impact analysis of regulations affecting small businesses. Is the gain in emission reduction worth the price that will have to be paid?
Washington	YRCCA: More local orientation with respect to implementation of CAA. County officials should be further enabled to work with local sources. Local air quality agency staff should participate in local service and business organizations. Local agencies of all types should be more active in cooperative functions
Wisconsin	EPA should insist that all regions become equally active in order to maintain a uniform CAP effort throughout the USA. Continue to develop opportunities for private/public sector cooperation between regulated industry and government agencies like the Great Printers Project. Encourage and provide incentives for small businesses to adopt environmental management systems.

No recommendations reported:

Hawaii, Idaho, Kansas, Mississippi, Missouri, Nebraska, New Mexico, Vermont

TABLE G-4
CONFLICT OF INTEREST/CONFIDENTIALITY ISSUES

The SBTCPs provided information as to how their programs address internal or external conflicts of interest (COI) or perception that this program may not be confidential.

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Alabama	SBO is used as the primary point of contact for the SBTCP. When the SBO receives calls from businesses regarding compliance problems or questions, answers to those inquiries are solicited from the regulatory program personnel while keeping the caller's name and company confidential. If the nature of the subject was such that in imminent threat to human health or welfare was perceived, then confidentiality would not be offered and the caller would be advised to report the condition immediately.
Alaska	<p>Under Alaska law, all files and information retained by SBAP and SBO are open to public review. The only exception is information that is traditionally recognized, such as attorney-client, ongoing enforcement sensitive, or personnel records. Since the SBAP/SBO is non-enforcement, it does not use any of the attorney-client or enforcement privileges. Personnel records are not relevant to the businesses we assist.</p> <p>SBAP and SBO have an ongoing dialogue with the Department's Air Quality Section. There is an informal agreement that the Air Quality Program will not review the SBAP/SBO files. The Air Quality Program agrees that any violation of air quality regulations need to be discovered and documented by an Air Quality Inspector. This approach is explained to the businesses that request assistance from SBAP.</p> <p>SBAP and SBO do provide technical information to sources that call in and do not identify themselves. Also through the state web pages, businesses will be able to obtain information anonymously.</p> <p>To date, there have not been any problems with other sections of the department requesting to see our files. Also, there have been no requests from the public to view or copy SBAP files on businesses we have helped.</p>
Arizona	SBAP was moved out of the Air Quality regulatory program and housed under the Director's Office in a newly created Compliance Assistance Section. Agency policies have been developed regarding the On-site Compliance Assistance and a renewed effort has been made to work with the Compliance & Enforcement Programs within the Agency.
Maricopa Cty	N/R
Pima Cty	In four years of operation, PDEQ Business Assistance Program has never encountered a question or concern about confidentiality of information provided during compliance assistance. Perhaps the reason is that BAP staff are sincere in their approach and actions, have a successful track record and positive reputation, and are working on a local level with local staff, which lends itself to establishing and maintaining trust.
Arkansas	Agency does not encounter conflicts of interest.

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
California	The Ombudsman's Office is part of the Air Resources Board Chairman's Office and no COI or confidentiality issues have arisen yet.
SCAQMD	SBAP is located within a regulatory agency, but not in enforcement section. It is located in the Public Advisor's unit, which has a state legislative requirement to assist businesses. SBAP's role clearly defined in meetings with executive staff. Memorandum of Understanding between enforcement unit and SBAP under development. Written guidelines exist for enforcement staff and for SBAP when coordinating on-site confidential meetings.
Colorado	SBO is located in an agency independent of the air pollution regulatory agency, so the problem has not presented itself in regard to the SBO. SBAP is located in the air pollution regulatory agency; however they are removed from the enforcement section of their department. As of yet, a problem has not occurred.
Connecticut	Program is very open in that it does not offer confidentiality. Enforcement relief policies usually outlined for specific small business sectors. Referrals made to other programs offering confidentiality. Program offers access to high quality regulatory assistance and it appears that such assistance is very much in demand.
Delaware	<p>There are two issues here. One is an internal, and the other is whether or not clients believe that what information is offered by them regarding compliance issues will actually be treated as confidential. Frankly, I find the internal issue to be more challenging than dealing with clients. The regulatory and enforcement personnel seem to have some reluctance to provide information when names and identifying information are not associated with the request. For instance, if I ask general questions concerning compliance, or say I am working with a small business and want general information about compliance, there is some reluctance to supply this information without knowing names or people or businesses.</p> <p>Telling clients that they can feel free to discuss their compliance status and needs without fear of being reported to enforcement personnel is believable by most, but others are highly skeptical. We are planning to implement a formal policy within the Department that will address confidentiality within the Office of Business and Permitting, which includes the SBAP and the P2 program.</p>
District of Columbia	COI is inevitable in our program because the SBAP performs many other regulatory functions. SBAP also is a permit engineer who may recommend enforcement actions for noncompliance of her permit conditions. SBO is not a regulator and thus has no such appearance of conflict.
Florida	Program has not had a case where confidentiality was challenged.
Georgia	SBAP avoids the discussion and review of confidential materials with compliance and enforcement personnel. When in discussions with other programs in EPD about a small business client, the business names are not used; or, circumstances are presented and assurances are secured before any sensitive materials are discussed.
Hawaii	No comments.

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Idaho	<p>This hasn't been a big problem for us (at least it hasn't been expressed). The agency, as a whole, is working on showing businesses that we are there to assist them in compliance. We are taking a more proactive approach to problem solving. Confidentiality isn't something we have tried to maintain. We are more concerned with trust so we don't guarantee something that we can't.</p>
Illinois	<p>SBAP is at the IL Department of Commerce and Community Affairs, a non-regulatory agency. Companies are allowed confidentiality because we do not regulate. Our purpose is to assist. We can get information for the client, maintain their anonymity if they so chose, and assist them with their regulatory needs.</p>
Indiana	<p>CTAP is statutorily required to maintain confidentiality. In addition to the statutory requirement, a non-rule policy was published in the IN Register to discuss our implementation of the statute.</p> <p>To avoid a potential conflict of interest regarding confidentiality, CTAP is located within IDEM's Office of Pollution Prevention and Technical Assistance (OPPTA), which is a non-regulatory office. OPPTA had previously been located across the hall from the Office of Enforcement, but moved to a separate building in early 1995. In addition, visitor access to our office is restricted. Guests must be escorted when visiting non-CTAP personnel and are prohibited from entering the CTAP area.</p> <p>A detailed document on procedures to ensure confidentiality is under development, providing guidance for scenarios that CTAP is likely to encounter. In addition, CTAP staff are required to sign a statement agreeing to abide by the confidentiality policy, both upon joining CTAP and again when they leave.</p>
Iowa	<p>IAEAP is funded by DNR Air Quality Bureau (AOB). Contract terms require disclosure of EAEAP client list to DNR-AOB. The annual disclosure identifies client names and addresses, but does not include facility specific information. IAEAP informs clients that "confidentiality" does not exist.</p> <p>IAEAP considers the disclosure list insignificant for the following reasons: 1) Majority of clients must submit permit applications to DNR, which contain facility specific information. 2) To encourage voluntary compliance, DNR does not target small businesses that are receiving assistance from IAEAP.</p>
Kansas	<p>SBAP is under contract, which states that specific information regarding businesses (such as name, specialty, nature of inquiry, or other trade information) will not be reported to the regulatory agency; only numbers by SIC codes are reported.</p> <p>The Ombudsman (Public Advocate) has the approval by the division director and bureau directors to keep information confidential.</p> <p>Confidentiality has not been as issue.</p>

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Kentucky	<p>KY SBTCP is based on independence from the regulatory program. SBO is located in the Cabinet Secretary's Office. SBAP is offered through the Center for Business Development outside state government. CAP members are appointed by Executive Order of the Governor.</p> <p>The Economic Development Cabinet raised questions about the language used by SBAP regarding client confidentiality. After much discussion, revisions to these materials are pending.</p>
Jefferson Cty	<p>SBAP is administered from the Air Pollution Control District, therefore confidentiality is not an issue. The small business owner is, however, offered a fine-free correction period in which to come into compliance without penalty.</p>
Louisiana	<p>We publish the following policy on our Internet homepage: "The Small Business Assistance Program (SBAP) personnel will not voluntarily reveal any environmental information received from a small business to any regulatory agency, except: 1) a criminal act has been committed, 2) the violation is a serious hazard to life or the environment, or 3) the company is a repeat violator."</p> <p>We have not been involved in any situation where there was a conflict of interest or the perception that this program may not be confidential.</p>
Maine	<p>Department has adopted the Small Business Compliance Incentives Policy based on EPA guidance.</p>
Maryland	<p>This is not a problem. Most assistance is not personal assistance, but dissemination of information or assistance over the phone, which allows companies to remain anonymous. We do minimal on-site assistance.</p>
Massachusetts	<p>N/R</p>

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Michigan	<p><i>External Conflicts of Interest:</i> Confidentiality is not an issue because the current services provided by SBTCP are proactive. SBAP is eluding the confidentiality issue by developing guidance publications, workshops, and conducting phone consultations. At present, these activities do not warrant the collection of sensitive data. Additionally, SBAP does not perform on-site audits, so facility-specific information is not collected.</p> <p>SBTCP is in the process of developing a policy that explains how the program will respond when it becomes aware of a violation by a facility seeking assistance. The policy also will explain that information contained in SBTCP files or databases will not be shared with the regulatory agency (MI Air Quality Division). At present, Michigan's SBTCP cannot claim that this information is "confidential" unless a facility invokes a provision in MI's recently enacted "Environmental Audit Privilege and Immunity" law, which designates the terms of confidentiality between a facility and the regulatory agency in a "confidentiality agreement."</p> <p><i>Internal Conflicts of Interest:</i> SBTCP works closely with the regulatory agency (MI Air Quality Division) as it develops and executes all of its program objectives. SBAP staff are included in and advised of all policy developments regarding state implementation of the Clean Air Act. MI's SBAP acts as an education, outreach, and marketing arm for the state's air quality program, and that role has assisted the SBAP in avoiding internal conflicts of interest.</p>
Minnesota	<p>MOU between SBCAP and AQ/CES working well. Does not seem to be any perception problems with SBCAP and SBO operating within regulatory agency. We have the good reputation of helping people and word has spread through regulated community.</p> <p>Success in extending enforcement waiver to other media programs for wood finishing initiative demonstrates support for the goals of the program and no conflict of interest problems.</p> <p><i>There has been no serious challenge to either SBCAP or SBO programs' "confidential" handling of client information.</i></p>
Mississippi	<p>SBO and SBAP are regarded by DEQ as independent, confidential, and non-regulatory. Regulatory programs are regarding these programs as confidential to small businesses.</p> <p>On-site assistance is provided by an outside organization as authorized in EPA's Enforcement Policy for SBAP's option 2; therefore, no written correspondence on the compliance status of a small business is maintained by SBO and SBAP.</p>
Missouri	<p>Any violations found by the Technical Assistance Program are not reported to the regulatory programs unless they are determined to be an imminent threat to human health and/or the environment. Our information for a facility remains "off limits" to the regulatory programs until an enforcement action is taken by the regulatory programs by their own findings. They then can request to look at our files. The information in the file can either help or hurt the facility depending on whether they heeded our recommendations.</p>

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Montana	SBO/SBAP has not come across any potential cases of conflict of interest. However, several challenges to its policy of confidentiality have arisen. Each challenge was denied because the businesses in question had entered into compliance agreements with SBO/SBAP. SBO/SBAP follow the EPA Compliance Incentives for Small Business Policy for each business with which it works and guarantees confidentiality and protection from enforcement provided the business in question follows the terms of the compliance agreement.
Nebraska	NE's SBAP is under the Management Services Section within the Department of Environmental Quality. The ability of the Public Advocate to work with all sections and programs within the agency does not pose any major problems.
Nevada	For the SBAP, it is difficult, if not impossible, under our state disclosure laws, to provide complete confidentiality. However, we are sensitive to the needs of the small business community, and they may remain anonymous. We also may refer them to the BEP that is under contract to the SBAP, where their communications need to be kept confidential. SBAP has not had any requests for records and no business SBAP has assisted has asked for confidentiality.
Washoe Cty	There has not yet been any situations in which there has been any question of, or problems associated with, the confidentiality of SBAP. As yet, there has been no hint of conflict of interest in regard to this program that AQMD is aware.
Clark Cty	They are not aware that their system's program has elicited any claims of conflict of interest or that parts of the program were not confidential.
NV BAQ	Through the excess emission reporting regulation, a company may report excess emissions to BAQ without enforcement action providing they meet the criteria set forth within the regulation. This reporting regulation is emphasized during the workshops.
NV BEP	BEP provides third party confidential assistance and is located in the NV Small Business Development Center (NSBDC) operated out of the University of Nevada, Reno. The program has a strong reputation for protecting client confidentiality and this is a major reason that the SBDC is used to deliver environmental assistance. BEP offers "free and confidential" assistance to the business community, which is clearly stated in all of the distributed literature and mentioned during conversations on the assistance line. Such an approach has eliminated any internal and external conflicts of interest. The various regulatory agencies have accepted the fact there is a program that a small business can confidentially contact to get information regarding air quality violations and permitting, even if they are in violation of various regulations.

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
New Hampshire	<p>SBO and SBAP in NH are granted considerable leeway to assure confidentiality. OECA policy is used as a general policy for compliance and is augmented by a "self auditing" law and a P2 law, which grant audit privilege and confidentiality to small businesses.</p> <p>In addition, there are many accessions where complaints received by the Air Resources Division are referred to SBAP when they involve small businesses. These complaints are usually related to nuisance type issues that can be resolved through education. This referral policy frees up the limited enforcement staff to concentrate on more serious issues.</p> <p>It has proven to be very effective to work in partnership with the enforcement group to ensure the ultimate goal of environmental well being is met in the most efficient manner possible.</p>
New Jersey	<p>SBTCP agreement with DEP Enforcement that SBTCP information is confidential. SBTCP explains this at meetings, seminars, conferences, etc.</p>
New Mexico	<p>NM SBAP does not offer confidentiality. Instead, SBAP developed an amnesty program for small businesses (only those meeting the qualifications of a small business) who are making a good faith effort to comply with state and federal air pollution control regulations. The details of this program were developed with the Air Quality Bureau (AQB) staff responsible for enforcing state and federal air pollution control regulations. A small business must contact SBAP requesting assistance before amnesty will be considered. Amnesty will not be considered for violations that the AQB has discovered through other means (i.e., state/federal inspections prior to small business contact with SBAP, or citizen complaints/tips given to AQB prior to small business contact with SBAP). When a small business contacts SBAP requesting assistance, if eligible for amnesty, SBAP will notify the AQB enforcement section that the business is being granted amnesty and the business is protected from any legal actions or fines that may be levied.</p> <p>SBAP will continue amnesty for the small business until the violation is corrected, but only if the small business is working with SBAP and making good faith effort to correct the violation. The amnesty policy does not cover any criminal actions or any violation that may create a serious or immediate threat to the health of the people or the environment. SBAP will review the business' good faith efforts at least every 90 days. Amnesty may be terminated if the business is not showing good faith efforts to correct a violation(s). Amnesty only will be granted once to a small business person for the same violation.</p> <p>Any information that is observed by or revealed by SBAP and claimed as a trade secret by the small business will be treated as such by the department to the extent allowable under state law. The procedure for identifying trade secrets to the department is described in NMED's Public Records and Inspection Policy.</p>

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
New York	<p>Neither the SBO or SBAP is located within New York State's regulatory enforcement agency, the Department of Environmental Conservation (DEC). Additionally, NY State has legislated confidentiality for both SBO and SBAP. This information, obtained by SBTCP in the course of providing compliance assistance, is exempt from the Freedom of Information Law.</p> <p>All SBTCP contacts are held in strictest confidence, and requests to DEC for information or regulatory clarification are made without revealing the client's identity, unless the SBTCP has obtained prior approval from the client to do so.</p> <p>SBAP's offices are in the same building as the central offices of DEC. Having identical street addresses has meant that SBAP must take great pains to assure clients that materials they send to SBAP during the course of receiving technical assistance are not shared with DEC and are held completely in confidence.</p>
North Carolina	<p>In November 1993, NC Department of Environment, Health, and Natural Resources issued a Confidential Policy for the Offices of Waste Reduction and Small Business Ombudsman. Since the entire SBAP and SBO are in the Office of the Small Business Ombudsman, the policy applies to all operations of the SBTCP. The policy states that the regulatory divisions will not seek to obtain information about compliance of any individual from the two assistance offices. Further it states that the OWR and SBO will maintain confidentiality of information to the maximum extent allowed by law.</p>

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
North Dakota	<p>There are advantages and disadvantages to the organizational structure of SBAP and SBO. As structured, SBAP and SBO may not appear to be free from conflict of interest. Although SBAP staff are part of the permit section, which is separate from the compliance section, it is difficult to know whether small businesses are reluctant to request assistance from SBAP, since SBAP staff are part of the air pollution control regulatory program. Also, it is unknown whether small businesses are reluctant to request assistance or confide in the SBO since the ombudsman is housed within and employed by the Department of Health. Besides serving as SBO, the ombudsman has other duties that support the administrative functioning (e.g., coordinating emergency response, quality assurance, pollution prevention, and various staff training needs) of the Environmental Health Section. The Department has had very few enforcement actions involving small business and the SBO's assistance regarding enforcement matters has not been requested to date. SBO has requested the Department's Chief of the Environmental Health Section to refer cases to the SBO when a small business expresses dissatisfaction or frustration in their dealings with the Department. This is an area that should receive continued monitoring and evaluation.</p> <p>The environmental programs of the Department's Environmental Health Section have traditionally been assistance and compliance oriented, with enforcement reserved for recalcitrant violators or where damage to health and/or environment has occurred. Even prior to the establishment of the SBAP or SBO, the Department's emphasis has been on educating and assisting the regulated community to achieve compliance. With the establishment of SBAP and SBO, the fundamental approach to compliance hasn't changed noticeably. However, with the establishment of SBAP and SBO, there has been more outreach to actively advertise the Department's assistance-oriented philosophy.</p> <p>With respect to confidentiality, dialogue between SBO and SBAP has resulted in the understanding that small businesses may reveal certain information to SBO that may be treated confidentially and not disclosed to, or sought to be disclosed from, the SBAP. Information disclosed by small business directly to SBAP staff would not be turned over to the compliance program staff for enforcement purposes; however, it is expected that a plan for correcting any violations would be developed. When needed, compliance assistance will be provided from SBAP.</p> <p>It is the SBAP's and SBO's position that confidentiality (disclosure of violations to enforcement staff) has really been a non-issue in North Dakota.</p>
Ohio	<p>SBAP is physically separated from OEPA enforcement staff (different floors) and is not located at a district office where enforcement begins. SBAP files are kept in a separate area and SBAP databases are accessible by SBAP only.</p> <p>SBAP has not experienced any problems with keeping information confidential. In some cases where the customer was referred by a district office because of violations, SBAP has spoken directly with the district office to resolve the problem. This was done only with prior approval of the company.</p> <p>In addition, both SBO and SBAP in Ohio operate under very strict state confidentiality laws specifically written for these programs. The strength of the language gives comfort to businesses.</p>

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Oklahoma	In OK, SBAP is housed in the Customer Assistance Program within the Department of Environmental Quality. As a result, we are provided with a strong identity in regard to confidential assistance. Our group is supported very strongly by our Agency management and as a result of this, we are provided with the tools we need within our own Agency to provide quality confidential assistance.
Oregon	<p>Information disclosed and minor violations discovered from on-site small business technical assistance visits are protected by state statute except when there is reasonable cause to believe there is a clear and immediate danger to public health or safety of the environment. In accordance with the state statute and the confidentiality option set forth in EPA's Office of Enforcement and Compliance enforcement policy, the OR SBAP adopted a written Confidentiality Policy. In summary, the policy requires SBAP to function independently of the enforcement section, restrict access to information and files of small businesses receiving technical assistance, keep businesses names and locations in separate confidential files, and perform follow-up consultations to assure resolutions of violations discovered during on-site visits.</p> <p>This policy has not caused any conflicts on interest inside or outside the agency. To the contrary, it allows additional flexibility to bring small businesses into environmental compliance. For example, it allows SBAP to assist a small business that faces enforcement through other channels by allowing the staff to assist with P2, applying for permits, and mitigating penalties via supplemental environmental projects (SEPs). In such cases, OR's Confidentiality Policy is congruous with EPA's Policy of Compliance Incentives for Small Businesses.</p>
Pennsylvania	Many services of the PA SBAP have been contracted to a private company. The terms of this contract prohibit the contractor from providing client names and addresses to the regulatory agency. The contractor primarily seeks contracts with government agencies, and therefore does not normally have small business clients outside of the SBAP contract. This arrangement, to date, has avoided any problems with conflict of interest and has provided a solution to the confidentiality issue.
Puerto Rico	All businesses that might be affected by regulations and have problems getting into compliance are referred to the SBAP staff for all the necessary help.
Rhode Island	RI DEM has been operating a non-regulatory technical assistance program since 1987. Since that time, we have worked with more than 200 companies and have gained the trust of many more. Conflicts of interest are avoided through close coordination with the regulatory Office of Air Resources.
South Carolina	SBAP/SBO are located in Administration, away from regulatory section of agency. This has not been an issue between Program and regulatory staff.
South Dakota	It has not been a problem so far.
Tennessee	TN developed a self-auditing policy, which is currently being disseminated across the state, and feedback is being sought. The regulatory agencies (there are five in our state) have demonstrated tremendous support for program activities. They respect the confidential nature of our program. We have not experienced problems.

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Texas	<p>In 1993, SBAP developed a Confidentiality Policy for small businesses that was adopted by the TNRCC Commission. SBAP operates under a multimedia TNRCC policy that provides for confidentiality from the enforcement program of the agency. We work closely with TNRCC Executive Office, Enforcement, and Field Operations to ensure that all are aware of the Confidentiality Policy. The Enforcement Division now refers small businesses to our office for confidential assistance. All printed materials developed by SBAP contain confidentiality policy statement. The confidentiality policy that started with the Air Program has been expanded to all media that the TNRCC regulates.</p>
Utah	<p>Several concerns expressed regarding general confidentiality issues. It was also reported that an outside program that was advertising confidentiality was not considered to be confidential. After legislative review by UT's Attorney General's Office, it was determined that although a self-audit bill exists, it did not cover on-site visits. Further, federal and state government records are, in many cases, open and available for public review.</p>
Vermont	N/R
Virginia	<p>DEQ implemented and utilizes EPA's Section 507 Enforcement Policy.</p> <p>The issue of confidentiality has not been a major problem. It is still felt this issue will take on more importance as the SBAP moves further into voluntary complimentary compliance audits as additional resources become available. The ability to deliver a quality product to the customer is only as good as the credibility of the provider. The ability to correct deficiencies and non-compliance situations through the 507 Enforcement Policy provides a non-confrontational means to achieve compliance assistance and deliver a quality product. It is also important to realize that the ability to fix a problem with relative ease can be put into the category of a smart business decision.</p> <p>Within DEQ, the continued involvement of SBO/SBAP with the Enforcement and Compliance Office also helps to ensure an understanding of the needs on both sides of compliance enforcement issues, fully recognizing that compliance is the ultimate goal. As EPA expanded the 507 Policy to water in waste in June 1996, the VA legislature also has provided additional tools to the business community in the form of voluntary remediation and voluntary audit privilege.</p>
Virgin Islands	N/A

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
Washington	<p>Revised Code of Washington, Chapter 70.94.035: "The department (of Ecology) shall establish a technical assistance unit within its air quality program, consistent with the CAA,...No representative of...the technical assistance unit...may have enforcement authority...Consultation(s)...shall not be regarded as an inspection or investigation...No enforcement action shall be taken...for violations...unless and until the facility owner or operator has been provided reasonable time to correct (any) violation." Violations that pose immediate threats to public health and the environment may result in immediate enforcement action.</p> <p>SBAP staff are obligated to report personally-detected violations (i.e., from on-site visits) to agency enforcement staff. Reporting is discretionary in the case of suspected violations or those suggested by the source with the exception of those posing "imminent threat."</p>
BCCAA	<p>If small business requests it, we can take off the regulatory hat and just help them without documenting deficiencies or writing notices of violation. However, this can be part of the enforcement policy of the field inspector. He can simply say, "I didn't see all these problems. I will be back in three months. Can you have A..., B..., C...corrected by then or do you need more time? Look in the Yellow Pages under...or call... and get some help." Air quality authorities are allowed to give warning tickets. They also are allowed to give detailed corrective action. Standard civil penalties can be mitigated to a fraction of the standard penalty if a small business spends a lot on correcting the problem.</p> <p>The field persons see the good and the bad. The field persons need to be freed by their supervision and management to help the small businesses with their field knowledge or to have them call an experienced inspector or engineer for help.</p>
OAPCA	<p>OAPCA utilizes its own SBAP record form. One section of that one-page form addresses "Compliance Assistance Site Visit Acknowledgment." It explains terms of an agreement and allows the business owner to sign indicating that there will not be a conflict of interest between assistance and enforcement (i.e., specific times are set in which no enforcement will be taken while compliance is achieved). The agency strives to maintain confidentiality with the previously mentioned forms and information.</p>
SWAPCA	<p>Program is subcontracted outside the agency.</p>
YRCCA	<p>The intent of avoiding any conflict of interest, either real, imagined, or perceived, must come about as a result of the comfort level of the parties involved. An inspection of a facility might expose certain conditions that make that operation "out of compliance" to a particular regulation. Rather than immediately imposing a correction notice, a business assistance solution to the problem might be an alternative method to resolving the situation.</p> <p>This approach can be used successfully if the terms/conditions are negotiated and written down as to what procedures are to be followed. This cooperative approach should achieve the same objective as levying a penalty that is to improve air quality for our jurisdiction. This partnership between the parties involved offers what business owners have indicated is required to keep compliance regulations from becoming economically burdensome.</p>

**TABLE G-4
(Continued)**

STATE OR TERRITORY	COI ISSUES AND RESOLUTIONS
West Virginia	<p>SBAP operates separately and independently from the enforcement group of the agency. Also, SBAP currently is housed in a separate physical location. To better help small businesses, enforcement refers some violators to SBAP for technical assistance to facilitate compliance. In fact, the referrals from enforcement have increased dramatically this year. SBO also intervenes in specific enforcement actions to ensure that small businesses are fairly treated. SBAP does not refer any cases to enforcement except in the case in imminent danger. However, to ensure that compliance is eventually achieved, SBAP will make on-site assessment files available to enforcement after an 18-month grace period. The business is not shielded from enforcement actions related to violations independently discovered by state (or federal) inspectors during this period. Such independent discovery may occur through routine inspection activity or complaint investigation.</p>
Wisconsin	<p>Wisconsin SBAP/SBO is a cooperative effort between WI Department of Natural Resources (DNR) and the non-regulatory component of WI Department of Commerce. The primary responsibility for interacting with business rests with Department of Commerce staff. A memorandum of understanding has been established between Commerce and DNR that allows business to speak to Commerce staff on a confidential basis. As a rule, we ask our customers if they do not want to be identified if we have to discuss their situation with DNR representatives.</p>
Wyoming	<p>The problem of COI or the fact that SBAP does not have confidentiality has not been resolved internally or externally. CAP has recommended that confidentiality is necessary for an effective SBAP; however, the department has maintained that state statute prohibits confidentiality since all received information must be available to the general public, other than trade secrets. CAP believes that the result of this impasse is a less than effective SBAP where the bottom line is to provide compliance and technical assistance to the small business community. The Department initiated the drafting of its Small Business Voluntary Disclosure and Incentive Rule that provides penalty waivers for small businesses that voluntarily disclose non-compliance and work with the Department to achieve compliance.</p>